

TITLE I, PART A HANDBOOK For 2004-05

Division of Federal Programs and Instructional Equity

(502) 564-3791

Kentucky Department of Education

TABLE OF CONTENTS

<u>PURPOSE OF HANDBOOK</u>	<u>3</u>
<u>GLOSSARY</u>	<u>4</u>
<u>TITLE I, PART A PROGRAM REQUIREMENTS</u>	<u>8</u>
<u>SCHOOL AND DISTRICT IMPROVEMENT UNDER NCLB</u>	<u>19</u>
<u>PARAEDUCATORS</u>	<u>33</u>
<u>PROFESSIONAL QUALIFICATIONS OF TEACHERS</u>	
<u>NOTIFICATION TO PARENTS</u>	<u>39</u>
<u>HOMELESS EDUCATION</u>	<u>46</u>
<u>NEGLECTED INSTITUTIONS</u>	<u>53</u>
<u>PRESCHOOL AND TITLE I</u>	<u>59</u>
<u>PARENT INVOLVEMENT</u>	<u>62</u>
<u>PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND</u>	
<u>TEACHERS</u>	<u>73</u>
<u>SCIENTIFICALLY BASED RESEARCH STRATEGIES</u>	<u>83</u>
<u>SCHOOLWIDE PROGRAM</u>	<u>91</u>
<u>TARGETED ASSISTANCE SCHOOL</u>	<u>100</u>
<u>SCHOOL BASED DECISION MAKING AND TITLE I</u>	<u>113</u>
<u>ALLOCATION PROCEDURE</u>	<u>116</u>
<u>TRANSFERABILITY OF FEDERAL FUNDS</u>	<u>119</u>
<u>TITLE I, PART A FINANCIAL INFORMATION</u>	<u>122</u>
<u>BUDGETING INFORMATION</u>	<u>131</u>
<u>OTHER INFORMATION</u>	<u>137</u>

PURPOSE OF TITLE I, PART A HANDBOOK

The technical assistance documents in the *Title I, Part A Handbook* are intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education (USDOE) policy guidance that may be found at <http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>. The following policy guidance documents referred to in the handbook are currently available. The U.S. Department of Education will place others on their website as they become available.

1. *Improving Teacher Quality Guidance* – (for Title II state grant programs) focuses on preparing, training, and recruiting high quality teachers and principals.
2. *LEA and School Improvement Guidance* – provides overview of district and school improvement under Title I, Part A of the *Elementary and Secondary Education Act* (ESEA), as reauthorized under the *No Child Left Behind Act* (NCLB).
3. *Parental Involvement* – assists states, districts and schools in administering the parental involvement provisions of Title I, Part A of the ESEA.
4. *Public School Choice* – highlights key aspects of the public school choice component (option to transfer) of Title I and offers guidance that may be useful in implementing the requirements.
5. *Serving Preschool Children under Title I* – provides the rationale for using Title I funds for preschool services, identifies the components of a quality program, and addresses many administrative issues.
6. *Supplemental Educational Services* – provides information of additional academic instruction designed to increase the academic achievement of students in Title I schools that have not made adequate yearly progress for 3 years.
7. *Title I Paraprofessionals Guidance* – provides questions and answers on requirements for and assessment of paraeducators.
8. *Title I Services to Private School Children* – addresses a district's responsibilities in making sure that eligible private school children receive equitable services under Title I, Part A of ESEA.

The technical assistance documents in the handbook are based on the USDOE policy guidance and the *No Child Left Behind Act*. The particular sections of the NCLB legislation are referenced in the title of each document. The NCLB legislation and the NCLB regulations are available on the USDOE website at <http://www.ed.gov/about/offices/list/oese/legislation.html>

Use the technical assistance documents in the handbook, the policy guidance, the legislation, and the regulations in planning and implementing the many aspects of Title I, Part A to maximize services to disadvantaged children. If you have questions or want to discuss any aspect of Title I, Part A, please call a Title I program consultant at (502) 564-3791.

GLOSSARY

NCLB, Title I, Part A and Title IX, Section 9101

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NCLB, Title I, Part A and Title IX, Section 9101

Core Academic Subjects – English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography

Distance Learning – the transmission of educational or instructional programming to geographically dispersed individual and groups via telecommunications

Family Literacy Services – services provided to participants on a voluntary basis that are of sufficient intensity in terms of hours, and of sufficient duration, to make sustainable changes in a family, and that integrate all of the following activities:

- Interactive literacy activities between parents and their children.
- Training for parents regarding how to be the primary teacher for their children and full partners in the education of their children.
- Parent literacy training that leads to economic self-sufficiency.
- An age-appropriate education to prepare children for success in school and life experiences.

High Poverty School – school in the top quartile of poverty (75% or above)

Highly Qualified –

The teacher –

- Holds at least a bachelor's degree;
- Holds full Kentucky certification (emergency, probationary and adjunct instructor certifications are not full Kentucky certifications); **AND**
- Demonstrates competency in each of the core academic subjects taught.

The paraeducator –

- Has completed at least 2 years of study at an institution of higher education;
- Obtained an associate's (or higher) degree; **or**
- Met a rigorous standard of quality and can demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing in reading, writing, and mathematics.

High, Objective, Uniform State Standard of Evaluation (HOUSSE) – NCLB allows states to develop an additional way for current teachers to demonstrate subject-matter competency and meet highly qualified teacher requirements. Proof may consist of a combination of teaching experience, professional development, and knowledge in the subject garnered over time in the profession.

Limited English Proficient – the term limited English proficient, when used with respect to an individual, means an individual:

- Who is aged 3 through 21; who is enrolled or preparing to enroll in an elementary school or secondary school; who was not born in the United States or whose native language is a language other than English; who is a Native American or Alaska Native, or a native resident of the outlying areas; and
- Who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
- Whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual the ability to meet the state's proficient level of

achievement on State assessments; the ability to successfully achieve in classrooms where the language of instruction is English; or the opportunity to participate fully in society.

Local Educational Agency (LEA) – a public board of education or other public authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or of or for a combination of school districts or counties that is recognized in a state as an administrative agency for its public elementary schools or secondary schools. In short, an LEA is a school district.

Paraprofessional/Paraeducator – a classified employee, under the direct supervision of a teacher. The paraeducator may be assigned to:

- Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher
- Assist with classroom management, such as organizing instructional and other materials
- Provide assistance in a computer laboratory
- Conduct parental involvement activities
- Provide support in a library or media center
- Act as a translator
- Provide instructional services to students under the direct supervision of a highly qualified teacher

Parental Involvement – the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, that includes ensuring:

- Parents play an integral role in assisting their child's learning;
- Parents are encouraged to be actively involved in their child's education at school;
- Parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child;
- The carrying out of other parent involvement activities.

Professional Development – includes, but is not limited to, activities that:

- Improve and increase teachers' knowledge of academic subjects and enable teachers to become highly qualified;
- Are an integral part of broad schoolwide and districtwide educational improvement plans;
- Give teachers and principals the knowledge and skills to help students meet challenging State academic standards;
- Improve classroom management skills;
- Are sustained, intensive, and classroom-focused and are not one-day or short-term workshops;
- Advance teacher understanding of effective instruction strategies that are based on scientifically based research; and
- Are developed with extensive participation of teachers, principals, parents, and administrators.

School Attendance Area – the geographic area in which the children who are normally served by that school reside.

Scientifically Based Research – research that:

- Involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs

- Employs systematic, empirical methods that draw on observation or experiment; involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn
- Relies on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators
- Is evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random-assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls; ensures that experimental studies are presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings
- Has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review

State Educational Agency (SEA) – The term state educational agency means the agency primarily responsible for the State supervision of public elementary schools and secondary schools (Kentucky Department of Education).

TITLE I, PART A PROGRAM REQUIREMENTS

NCLB, Title I, Part A

TITLE I, PART A, PROGRAM REQUIREMENTS

NCLB, Title I, Part A

Purpose of Title I, Part A: Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind (NCLB) Act, is designed to help disadvantaged children reach high academic standards. The following requirements in the *No Child Left Behind Act* (NCLB) apply to districts receiving Title I, Part A funds.

DISTRICT REQUIREMENTS

1. **School Attendance Areas:** A district must rank order all of its school attendance areas based on the percent of low-income children. The district must serve, in rank order of poverty, its schools above 75 percent poverty. Then the district has the option to (a) continue on with the district-wide ranking or (b) rank remaining schools by grade span grouping.
2. **Allocations:** A district must allocate Title I, Part A funds to participating schools based on Title I, Part A allocation procedures. Districts serving any school below 35% low-income must allocate Title I, Part A funds to participating schools based on a minimum per pupil amount using the 125% rule.
3. **Children from Local Institutions for Neglected Children:** A district must set aside funds for the special educational needs of children in local institutions for neglected children. Funds for service to the institution should be put in the district set-aside before funds are allocated to schools.
4. **Homeless Children:** Districts must provide services for homeless children who do not attend participating Title I schools, including providing educationally related support services to children in shelters. The services must be comparable to those provided to children in Title I schools. A district must set aside funds (regardless of receiving a McKinney-Vento Homeless Assistance Grant) for homeless children attending schools not served by Title I.
5. **Private School Children:** A district must provide eligible private school children, their families and teachers with Title I, Part A educational services that are equitable to those provided to eligible public school children, their families and teachers. These services must be determined in consultation with private school officials.
6. **Preschool Programs:** Preschool programs supported by Title I, Part A funds must comply with Head Start performance standards unless the preschool program is based on the Even Start model.
7. **Parent Involvement:** A district with an allocation over \$500,000 must reserve at least 1% of its allocation in the district set-asides for parent involvement activities and must distribute 95% of that 1% to Title I schools. A proportionate amount of the 95% must be used for parent involvement for parents of participating private school students. A written parent involvement policy at the district level must be developed jointly, agreed upon, and distributed to parents of participating children. The parent involvement policy must include:
 - Overall expectations for parent involvement;
 - Components for building capacity for more effective parent involvement; and
 - An annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.
8. **Highly Qualified Teachers:** Districts that receive Title I, Part A funds must ensure that teachers meet the NCLB definition of “highly qualified.” The Education Professional Standards Board (EPSB) is the agency that has the responsibility for the final determination

on issues relating to whether a person is "highly qualified." For that reason, it is essential that answers to specific questions from district personnel be answered by EPSB. The EPSB website <<http://www.kyepsb.net/>> has a Highly Qualified Teacher Calculator for teachers/administrators to determine who is "highly qualified" and collect supporting documentation. Please refer all inquiries to Wendell Cave. He may be reached by email at: Wendell.cave@mail.state.ky.us. The phone number is (502) 564-4606. The following must be ensured by districts:

- Teachers hired after the first day of the 2002-03 school year who teach core academic subjects in a program supported with Title I, Part A funds are highly qualified. In a schoolwide program, the requirement applies to all teachers who teach core academic subjects. In a targeted assistance school, the requirement applies to teachers funded from Title I, Part A that teach in core academic subjects. The requirement also applies to teachers funded from Title I, Part A to provide services to eligible private school students. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, history, geography, and arts.
 - **All teachers** (including special education teachers) who teach core academic subjects are highly qualified by the end of the 2005-06 school year. The requirement applies to **all** teachers in all elementary and secondary schools, regardless of funding. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, history, geography, and arts.
9. **Parents Right to Request:** Local school districts must annually notify parents of their right to request information on the professional qualifications of their children's teachers.
10. **Paraeducators:** Districts must ensure that all paraeducators in a program supported with Title I funds meet one of the following requirements by January 8, 2006:
- Completed at least 2 years of study at an institution of higher education;
 - Obtained an associate's (or higher) degree; or
 - Met a rigorous standard through the Kentucky Paraeducator's Assessment or an assessment that meets the required criteria.
11. **Professional Development:**
- **Highly Qualified Staff** – The district must use Title I, Part A funds for professional development activities to ensure that teachers and paraeducators in programs supported with Title I funds meet the requirement of becoming "highly qualified." Not less than 5% of the district's Title I, Part A allocation per year is required. The district is not required to set-aside and spend the total 5% if a lesser amount is sufficient to ensure that the teachers and paraprofessional meet the definition of "highly qualified."
 - **District Improvement** – If the district does not make adequate yearly progress (AYP) the district must set aside 10% of the district's allocation for professional development for staff in Title I schools.
12. **School Improvement:** Districts must meet Title I, Part A school improvement requirements for Title I schools not making adequate yearly progress. The district's obligation for transfer-related transportation and supplemental educational services is equal to 20 percent of its district Title I, Part A allocation unless a lesser amount is needed. The funds may come from other sources. Within the 20%, a district must spend
- An amount equal to 5 percent for transfer-related transportation;
 - An amount equal to 5 percent for supplemental education services for low-income students only; and
 - An amount equal to 10 percent for transportation or supplemental education services, or

both as the district determines.

13. **Option to Transfer and Supplemental Educational Services:** Districts must annually notify parents of eligible students attending schools identified for improvement of their options to transfer their child to another public school or to obtain supplemental educational services.
14. **Maintenance of Fiscal Effort:** A district may receive Title I, Part A funds for any fiscal year only if either its combined fiscal effort per student or the aggregate expenditures of the district and the state with respect to the provision of free public education by the district for the preceding fiscal year is not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.
15. **Comparability:** A district must meet the comparability requirement as follows: A district may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I, Part A schools that are at least comparable to the services provided in schools that are not receiving Title I, Part A funds.
16. **Supplement versus Supplant:** A district may use Title I, Part A funds only to supplement the funds that would, in the absence of Title I, Part A funds, be made available from non-Federal sources for the education of children participating in Title I, Part A programs. In no case may Title I, Part A funds be used to supplant, take the place of, funds from non-Federal sources.
17. **Carryover Funds:** For districts with Title I, Part A allocations of \$50,000 or more, carryover funds on September 30 are limited to no more than 15%. A state education agency (SEA) may grant a one-time waiver of the percentage limitation during a three-year period upon written request of a district if it determines the request is reasonable and necessary or if supplemental appropriations become available.
18. **Transferability of Funds:** A district may transfer up to 50 percent of funds from other Federal programs (Title II, Part A; Title II, Part D; Title IV, Part A and Title V, Part A) into Title I, Part A. A district may **not** transfer Title I, Part A funds into other Federal programs. A district that has been identified for improvement may transfer up to 30 percent of funds from other Federal programs into Title I, Part A. When a district is identified for improvement, all transferred funds must be used for district improvement activities. The district must submit a Transfer Amendment to the Division of Budgets in the Kentucky Department of Education. Transfer Amendments must be received at KDE between June 1 and September 30. The total of the Title I allocation + (plus) the amount transferred from other Title programs must be used:
 - To calculate the minimum per pupil amount for districts subject to the 125%;
 - To determine required percentages in district set-asides; and
 - To determine the allocations to public schools served by Title I and to determine the private school program allocation to serve eligible private school children.
19. **Records:** Records must be maintained at both the school and district level for the current year and three (3) prior years.

SCHOOLWIDE PROGRAM REQUIREMENTS

NCLB, Title I, Part A, Sections 1114 and 1119

Definition: A school with at least 40% low-income is eligible to plan and implement a schoolwide program (SWP). A schoolwide program must upgrade the entire educational program in the school in order to raise academic achievement for all the students. A schoolwide program:

- Is based on a year of planning and is built on schoolwide reform strategies, rather than on separate add-on services.
- Provides flexibility in spending Federal, State, and local funds as long as the school engages in strategies that increase the amount and quality of learning time and help provide a high-quality curriculum for all children, according to a comprehensive school improvement plan to help children meet Kentucky's standards.
- Focuses on results. The flexibility in the use of funds must result in increased achievement by subgroup populations (economically disadvantaged, racial and ethnic groups, students with disabilities and students with limited English proficiency).

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure compliance of school expenditures.

Eligible Children: The school is not required to identify particular children. All children are to be provided the opportunity to meet the academic expectations. The focus is on the instructional program instead of particular children.

Needs Assessment: As a part of comprehensive school improvement planning, the school conducts a needs assessment of all children in the school based on their performance toward meeting the academic expectations. The needs assessment should identify priority needs in student performance in core areas of English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography. The priority needs identified must determine how resources are used.

Components of Schoolwide Program: Title I, Part A does not have to pay for the 10 components in a schoolwide program, but a school with a schoolwide program must include these components in its school. The schoolwide program must:

1. Be based on a comprehensive needs assessment of the entire school that is based on information on the performance of children in relation to the state content and student performance standards.
2. Engage in schoolwide reform strategies that:
 - Provide opportunities for all children to meet Kentucky's proficient and distinguished levels of student performance;
 - Are based on effective means of improving children's achievement that strengthen the core academic program;
 - Use effective instructional strategies that are based on scientific research that increase the amount and quality of learning time (such as extended school year, before- and After-school and summer programs); help provide an enriched and accelerated curriculum; and meet the educational needs of historically underserved populations;
 - Address the needs of all children in the school, but particularly the needs of subgroup

populations and determine how these needs are met. Programs may include counseling; pupil services; mentoring; college and career awareness and preparation; and integration of vocational and technical education programs.

3. Provide instruction by highly qualified professional staff.
4. Provide for high quality and on-going professional development for teachers and paraeducators, parents, principals, and other staff to enable all children in the schoolwide program to meet the state's student performance standards.
5. Include strategies to attract high-quality highly qualified teachers to high-need schools.
6. Include strategies to increase parent involvement such as family literacy services.
7. Use strategies for assisting children in transition from early childhood programs to public elementary schools.
8. Include teachers in the decisions regarding the use of assessments to provide information on and to improve the achievement of individual students.
9. Ensure that students who experience difficulty mastering any of Kentucky's standards will be provided with effective, timely additional assistance.
10. Coordinate and integrate Federal, State, and local services.

Schoolwide Plan: During a one-year period (in consultation with the district, SBDM council, parents, staff and other members of the community) the school must include the following in the Comprehensive School Improvement Plan or in the Schoolwide Program Component Report:

- How the school will implement the ten components;
- How resources will be used to implement the components;
- A list of programs to be used; and
- How the school will provide parents with individual student assessment results in a language the parents can understand.

The Comprehensive School Improvement Plan must be:

- Effective for the duration of the school's participation as a schoolwide program;
- Reviewed and revised as necessary; and
- Available to the district, parents, and public.

Teachers in a Schoolwide Program: The focus of a schoolwide program is to raise the performance level of all students by improving the overall instructional program in the school through the integration of federal, state and local funds. Each Title I school must provide each parent timely notice that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject who does not meet the qualification requirements. Each year the principal of a Title I school must certify in writing that the school is complying with NCLB's mandate for highly qualified teachers. Regardless of funding, **all** teachers

- Must meet the *No Child Left Behind* (NCLB) definition of "highly qualified;" (All teachers hired in a schoolwide program after the first day of the 2002-03 school year who teach core academic subjects must be highly qualified. All teachers who teach core academic subjects (including special education teachers) must be highly qualified by the end of the 2005-06 school year.
- Must address identified needs through the comprehensive needs assessment; and
- Assist the school in increasing the effectiveness of the staff, parents, community and agencies in improving the school's performance.

Paraeducators in a Schoolwide Program: In a schoolwide program, paraeducators may be used to assist with instruction to students. NCLB requirements apply to all paraeducators with instructional duties in a schoolwide program. Regardless of funding, the district and school must ensure that by January 8, 2006 **all** paraeducators with instructional duties

- Have completed at least 2 years of study at an institute of higher education; obtained an associate's degree; or met a rigorous standard through Kentucky's Paraeducator Assessment or an assessment that meets the required criteria.
- Are included in professional development activities.
- Are under the direct supervision of a teacher who has primary responsibility for providing instructional services. The following is considered to be direct supervision of a teacher.
 - The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
 - The paraeducator works in close and frequent proximity with the teacher.
- Are **not** pulled to be a substitute teacher in a classroom as the paraeducators would not be under the direct supervision of a teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content.

Paraeducators working in a schoolwide program may:

- Participate in general professional development and school planning activities;
- Provide one-on-one tutoring at a time when a student would not otherwise receive instruction from a teacher;
- Provide assistance in a computer lab;
- Conduct parent involvement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Non-instructional Duties: A paraeducator in a program supported with Title I funds may assume limited non-instructional duties that are assigned to instructional staff in a program not supported with Title I funds as long as the amount of time spent on the limited duties is the same proportion of total work time as that of instructional staff at the same school. In a schoolwide program, all paraeducators with instructional duties work in a program supported with Title I funds.

Parent Involvement: A written parent involvement policy at the school level must be developed jointly with, agreed upon with, and distributed to all parents. The parent involvement policy must include:

- Expectations for parent involvement;
- Components for building capacity for more effective parent involvement;
- School-parent compacts, outlining shared responsibilities for high student performance;
- An annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.

Evaluation and School Improvement: Title I, Part A public schools are identified for Title I school improvement if they fail to make adequate yearly progress for 2 consecutive years. Each school identified for Title I improvement must make the necessary revisions in its Comprehensive School Improvement Plan in ways that have the greatest likelihood of improving the performance of participating children in meeting the state's student performance standards. The revised plan should be implemented immediately following such identification. A school that is identified for improvement must reserve and spend at least 10% of its Title I, Part A allocation for each fiscal year that the school is in improvement for professional development.

Supplement versus Supplant: Records must be maintained that document that Title I, Part A funds are used to supplement State and local funds. In a schoolwide program, Title I, Part A funds:

- Must be used to increase the level of funds that would, in the absence of Title I, Part A funds, be made available from non-Federal sources for the education of children in the school;
- Cannot be used to supplant, take the place of, funds from non-Federal sources; and
- Cannot be used to meet state requirements.

TARGETED ASSISTANCE SCHOOL REQUIREMENTS

NCLB, Title I, Part A, Sections 1115 and 1119

Definition: A targeted assistance school (TAS) must use funds only for programs that provide supplemental services for Title I identified children. The goal of a targeted assistance school is to improve teaching and learning to enable Title I, Part A participants to meet the academic standards that all children are expected to master.

School Allocation: The district must allocate funds to school attendance areas identified as eligible and selected to participate in rank order based on the percent of low-income students. The school allocation is determined by a per pupil amount times the total number of children from low-income families in each school. Funds are allocated for use by the school, but it remains the responsibility of the district to ensure compliance of school expenditures.

Eligible Children: The school identifies children who are failing or most at risk of failing to meet Kentucky's challenging academic standards and having the greatest academic need. Children who are economically disadvantaged, children with disabilities, migrant children, homeless children, and limited English proficient children are eligible for Title I, Part A services on the same basis as other children that are selected for services. From the list of eligible children, the school selects those children who have the greatest need for special assistance to receive Title I, Part A services in the identified focus areas. Core academic areas include English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography.

Needs Assessment: As a part of comprehensive school improvement planning, the school conducts a comprehensive needs assessment. This determines the focus areas of the Title I, Part A services. A targeted assistance school must identify students who are failing or most at risk of failing to meet state standards. An educational objective measure must be used to determine the students with the greatest academic needs. Those students with the greatest academic need in the identified focus areas are provided Title I, Part A services. The school must keep on file a list of this ranking of individual students.

Components of Targeted Assistance School: The targeted assistance school program must:

1. Use Title I, Part A resources for supplemental programs to help participating Title I children meet the academic expectations all children are expected to meet.
2. Ensure that planning for students receiving Title I services is incorporated into existing school planning.
3. Use effective instructional strategies that are based on scientific research that
 - Give primary consideration to providing extended learning time such as extended school year, before and after school, and summer programs;
 - Help provide an accelerated, high-quality curriculum; and
 - Minimize removing children from the regular classroom during regular school hours.
4. Coordinate with and support the regular educational program that may
 - Include services to assist preschool children's transition to elementary school;
 - If funds are not available from other public or private sources, then funds may be used to provide health, nutrition and other social services if these needs of the targeted students are part of the comprehensive needs assessment; and As a last resort, funds can be used to provide basic medical equipment such as eyeglasses, hearing aids and professional development to assist staff in identifying and meeting the comprehensive needs of eligible children.

5. Provide instruction by highly qualified staff.
6. Provide professional development opportunities with Title I, Part A resources and to the extent practicable, other sources, for administrators, teachers and other school staff who work with participating children.
7. Provide strategies to increase parent involvement, such as family literacy services.
8. Coordinate and integrate Federal, State, and local services and programs, including violence prevention, nutrition programs, housing programs, Head Start, adult education, vocational and technical education and job training.

Title I, Part A Teachers in a Targeted Assistance School: Title I services are provided to a select group of children rather than for overall school improvement. Each Title I school must provide each parent timely notice that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject who does not meet the qualification requirements. Each year the principals of a Title I school must certify in writing that the school is complying with NCLB's mandate for highly qualified teachers. Title I, Part A teachers must:

- Meet the *No Child Left Behind* (NCLB) definition of "highly qualified;" (Teachers hired with Title I, Part A funds after the first day of the 2002-03 school year who teach core academic subjects in a program supported with Title I, Part A funds must be highly qualified. All teachers who teach core academic subjects must be highly qualified by the end of 2005-06 school year. The requirement applies to all teachers in all elementary and secondary schools, regardless of funding. Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography.
- Provide supplemental services to participating Title I students in the focus area(s) of the Title I, Part A program;
- Coordinate with and support the regular educational program; and
- Minimize removing students from the regular classroom for additional instruction. Pullout services may **not** be routinely scheduled. Title I services may **not** be the only instruction provided.

Title I, Part A Paraeducators in a Targeted Assistance School: In a targeted assistance school, paraeducators may be used to provide supplemental instruction to participating Title I students as long as they are under the direct supervision of a teacher. The district and school must ensure that Title I, Part A paraeducators:

- Have completed at least 2 years of study at an institute of higher education or obtained an associate's degree or met a rigorous standard through Kentucky's Paraeducator Assessment or a assessment that meets the required criteria.
- Be included in professional development activities.
- Be under the direct supervision of a teacher who has primary responsibility for providing instructional services. Direct supervision of a teacher is considered to be:
 - The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
 - The paraeducator works in close and frequent proximity with the teacher.
- Are **not** pulled to be a substitute teacher in a classroom as the paraeducators would not be under the direct supervision of a teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a

paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content. Title I, Part A paraeducators in a targeted assistance school must provide additional assistance to identified Title I students:

- Participate in general professional development and school planning activities;
- Provide one-on-one tutoring at a time when a student would not otherwise receive instruction from a teacher;
- Provide assistance in a computer lab;
- Conduct parent involvement activities;
- Act as a translator; or
- Provide instructional services to students under the direct supervision of a teacher.

Non-instructional Duties: Title I, Part A paraeducators may assume limited non-instructional duties that are assigned to instructional staff paid with other funds as long as the amount of time spent on the limited duties is the same proportion of total work time as that of instructional staff at the same school.

Parent Involvement: A written parent involvement policy at the school level must be developed jointly with, agreed upon with, and distributed to parents of participating Title I, Part A children. The parent involvement policy must include:

- Expectations for parent involvement;
- Components for building capacity for more effective parent involvement;
- School-parent compacts, outlining shared responsibilities for high student performance;
- An annual evaluation of the content and effectiveness of the parent involvement activities in increasing participation of parents and whether there are barriers to greater participation.

Evaluation and School Improvement: Title I, Part A public schools are identified for Title I school improvement if they fail to make adequate yearly progress for 2 consecutive years. Each school identified for Title I improvement must make the necessary revisions in its Comprehensive School Improvement Plan in ways that have the greatest likelihood of improving the performance of participating children in meeting the state's student performance standards. The revised plan should be implemented immediately following such identification. A school that is identified for improvement must reserve and spend at least 10% of its Title I, Part A allocation for each fiscal year that the school is in improvement for professional development.

Supplement versus Supplant: Records must be maintained to document that Title I, Part A funds are spent on activities and services for Title I, Part A participating students. In a targeted assistance school, Title I funds must be used:

- To supplement, and **not** supplant, the amounts of funds that would be available from non-Federal sources for the education of students participating in the Title I, Part A program;
- For programs that provide services to participating Title I children identified as having the greatest academic need; and
- To provide services that are in addition to the regular instructional program.

SCHOOL AND DISTRICT IMPROVEMENT UNDER NCLB

NCLB Title I-A, Sections 1111 and 1116

SCHOOL AND DISTRICT IMPROVEMENT UNDER NCLB

NCLB Title I-A, Sections 1111 and 1116

As part of the *No Child Left Behind Act of 2001* (NCLB), states must use academic assessments and other indicators to annually review the progress of each school to determine whether the school makes adequate yearly progress. This technical assistance document briefly explains Kentucky's process for identifying schools and districts that do not make adequate yearly progress. The document also contains information about the NCLB consequences for Title I schools and districts that do not make adequate yearly progress. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *LEA and School Improvement, Public School Choice, and Supplemental Educational Services* that may be found at <http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.

ADEQUATE YEARLY PROGRSS (AYP)

Adequate yearly progress (AYP) is the measure a state uses to determine if a school is making continuous and substantial improvement.

1. Beginning with data from 2002-03, a school is determined to have made adequate yearly progress (AYP) for a school year if the school and all subpopulations of sufficient size:
 - a. Met annual measurable objectives (AMO) in reading and mathematics. The objectives are expressed as the percent of students at proficient and above in reading and mathematics.
 - b. Showed progress (i.e., met requirements) on the "other academic indicator."
 - i. The other academic indicator is the accountability index (lagged one year) at the elementary and middle school levels. An elementary or middle school is considered to have demonstrated growth on the "other academic indicator" if the school's prior year accountability index is 80 or higher; or the school's prior year accountability index is at or above the corresponding biennial goal; or the school's prior year's accountability index is greater when compared to the accountability index from the year before.
 - ii. The other academic indicator is graduation rate at the high school level. A high school is considered to have demonstrated growth on the "other academic indicator" if the school shows progress on the prior year graduation rate when compared to the year before; or meets the goals set for each year by the Kentucky Board of Education.
 - c. Tested at least 95% of enrolled students and subpopulations of sufficient size.
2. The specific subpopulations required for reporting NCLB AYP determinations are: All students, White (non-Hispanic), African-American, Hispanic, Asian, Limited English Proficiency, Free/Reduced Lunch, and Students with Disabilities.
3. A subpopulation of sufficient size is defined for reading and mathematics AMOs as at least 10 students per grade where NCLB assessments are administered **and** at least 60 students in these combined grades **or** the number of students in the subpopulation is at least 15% of the students in these combined grades.
4. A subpopulation of sufficient size is defined for participation rate as at least 10 students per grade where NCLB assessments are administered **and** at least 60 students in these combined grades.
5. As a safe harbor, a school that has not met the reading or mathematics AMO is considered to have met the objective if the school: Students in the particular population or subpopulation(s) have 10% fewer students scoring below proficient than last year (in reading and/or mathematics). **AND**

- b. Students in the same population or subpopulation(s) have improved their academic index **or** have obtained an academic index of 100 or greater.
6. Adequate yearly progress (AYP) determinations are made annually for all schools. A school that receives Title I-A funds is **identified for improvement** if it fails to make AYP for two (2) consecutive years.
7. A Title I school is no longer identified for improvement once it has made AYP for 2 consecutive years.
8. The method for calculating district accountability is consistent with the method for calculating school accountability. All students that have been enrolled in the district for a full academic year are counted in the district AYP determination. A district that receives Title I-A funds is **identified for improvement** if it fails to make AYP for two (2) consecutive years.

NCLB CONSEQUENCES FOR TITLE I SCHOOLS NOT MAKING AYP

If a **Title I school** does not make adequate yearly progress (AYP) for two (2) consecutive years, the school is identified for improvement and continues to be identified for improvement until it has made AYP for two (2) consecutive school years. The following information outlines the consequences while a Title I school is identified for improvement. Kentucky is using the term *tier* to define the years of not making adequate yearly progress (AYP) and the NCLB consequences. The consequences continue until the Title I school has made AYP for two (2) consecutive years.

Tier 1 of Consequences = 2 consecutive years of not making AYP. Tier 1 includes the following:

- **Parent Notification** – The district must notify parents with the reasons the Title I school is identified and what is being done to address the problem of low achievement.
- **Student Transfer Option (School Choice)** – The district must notify parents of students in a Title I school of the option to transfer to another public school.
- **District Technical Assistance** – The district must provide technical assistance as the Title I school develops and implements revisions in the comprehensive school improvement plan.
- **Revised Comprehensive School Improvement Plan** – The Title I school must revise its comprehensive improvement plan to address academic issues that caused the school to be identified.
- **Funds for Professional Development** – The Title I school must spend at least 10% of the Title I school allocation on professional development.

Tier 2 of Consequences = 3 years of not making AYP. Tier 2 includes all of the consequences listed in Tier 1 and the following:

- **Supplemental Educational Services** – The district must implement supplemental educational services for eligible students in a Title I school that has not made AYP for 3 years.

Tier 3 of Consequences = 4 years of not making AYP. Tier 3 includes all of the consequences listed in Tier 1 and Tier 2 and the following:

- **Corrective Action** – The district must take corrective action toward a Title I school that has not made AYP for 4 years.

Tier 4 of Consequences = 5 years of not making AYP. Tier 4 includes all of the consequences listed in Tier 1, Tier 2 and Tier 3 and the following:

- **Plan for Restructuring** – The district must write a plan for alternative governance for a Title I school that has not made AYP for 5 years.

Tier 5 of Consequences = 6 years of not making AYP. Tier 5 includes all of the consequences listed in Tier 1, Tier 2, Tier 3, Tier 4 and the following:

- **Implement Restructuring** – The district must implement the plan for alternative governance for a Title I school that has not made AYP for 6 years.

District Responsibilities for a Title I School in Tier 1 Consequences

The district should ensure that all schools understand the components of adequate yearly progress and assist schools in interpreting the NCLB federal accountability report. The district may facilitate planning for public school choice before assessment results are available. For example, transportation and communication plans may be developed before implementation is required. When one of its Title I schools is identified for improvement (Tier 1), the district must:

- Ensure that parents are notified regarding identification for improvement;
- Ensure that public school choice is provided for children whose parents wish to transfer them from the Title I school identified for improvement; and
- Ensure that the identified school receives technical assistance, both during the revision of its comprehensive school improvement plan and throughout the plan's implementation.

Notification to Parents

Meaningful parental involvement is one of the cornerstones of reform contained in the *No Child Left Behind Act*. It is essential that the district and school communicate with parents throughout the school improvement process and welcome them as key partners in addressing the academic issues that led to the school being identified for improvement. Information to parents must be in an understandable and uniform format. It must also, to the extent practical, be in a language the parents can understand. The initial notification to parents must include the following:

1. An explanation of what the identification means and how the school compares in terms of academic achievement to other schools served by Title I in the district and in Kentucky;
2. The reason(s) for the school being identified for improvement;
3. An explanation of what the school is doing to address the problem of low achievement;
4. An explanation of what the district is doing to help the school address the achievement problem;
5. An explanation of how the parents can become involved in addressing the academic issues that led to identification; and
6. An explanation of the parents' options to transfer their child to another public school that is not identified for improvement.

Student Transfer Option (Public School Choice)

The district is required to offer students enrolled in the identified school the option to transfer to another public school in the school district that has **not** been identified for improvement. The school of choice does **not** have to receive Title I services as long as it is not identified for improvement.

There may be very limited circumstances under which the option to transfer may not be possible, particularly in some sparsely populated areas. For example, a district with only one school at a particular grade level, or a district in which all schools at a grade level are identified for improvement, will not be able to offer the option to transfer to another public school in the

district. In such cases, to the extent practical, the district must enter into cooperative agreements with other nearby school districts to permit transfers. In limited circumstances where the option to transfer is not possible, the district may offer supplemental educational services during the school's first year of improvement.

As soon as the Title I school is identified for improvement, the district must immediately notify parents of the school choice option. The district must make choice available for students the first day of the school year. The notification must provide parents with enough relevant information to help them decide what school is best for their child. At a minimum, the district must inform parents about the academic achievement level of students at the school or schools to which the child may transfer, but it may also choose to include other information, such as a description of special academic programs, facilities, before-or-after school programs, the professional qualifications of teachers in the core academic subjects or parent involvement opportunities.

The district must give all students in the identified school the opportunity to transfer to another public school. In implementing this option to transfer, there may be circumstances in which the district needs to give priority to the lowest-achieving children from low-income families. For example, if not all students can attend their first choice of schools, the district would give priority in assigning spaces to the low-achieving low-income students. If the district does not have sufficient funding to provide transportation to all students who wish to transfer, it would apply this priority in determining which students would receive transportation. The district must determine low-income using the same data that it uses in allocating Title I funds to schools. Usually low-income is based on free and reduced meal data. The district has flexibility in determining which students from low-income families are lowest achieving. Students from low-income families might be rank-ordered based on their achievement levels (determined by using objective educational measures).

The district must offer more than one choice to students attending an identified school if there is more than one school in the district that is not identified for improvement. The district may **not** use lack of capacity to deny students the option to transfer but may take capacity into consideration in deciding which choices to make available to students in the identified school.

The district may set timelines for parents to make their decision on choice. The district must set a reasonable deadline by which parents must apply and ensure that the parents have a sufficient time and information to make an informed decision about selecting a school. The district should ensure that policies for receiving choice-related communications from parents do not impede parents' opportunities to exercise choice options. Parents should be able to communicate their choices in a variety of ways, including by standard mail, email or fax. The district should confirm with parents that it has received their communication regarding choice.

The district makes the final decision on the school each eligible child will attend. The district must take parent's preferences into consideration in making the decision. The district might allow parents to rank-order their preference among the schools that are available to receive transfer students. Once the district has made its decision, parents must have the option to decline the opportunity to move their child to the new school.

The district may use Title I funds as well as other federal, state, local and private resources to pay for transportation for school choice required as part of the school improvement process. The district must offer choice to all students in an identified Title I school until the school has made AYP for 2 consecutive years and is no longer identified for improvement. The district must provide transportation for those students choosing the option to transfer while the school is identified for improvement. The district must permit the student to remain in the new school until he or she has completed the highest grade in the school. However, the district is no longer obligated to provide transportation for the student after the end of the school year in which the student's school of origin is no longer identified for improvement.

District Technical Assistance

The district must provide technical assistance to the Title I school(s) identified for improvement. The technical assistance must be provided as the school revises and implements its comprehensive school improvement plan. Technical assistance is practical advice that addresses specific areas for improvement. The technical assistance may be provided by the district, the Kentucky Department of Education, an institution of higher education, a private not-for-profit organization or a for-profit organization, an education service agency or another entity with experience in helping schools improve academic achievement. The technical assistance must include:

1. Assistance in analyzing data from CATS and examples of student work to identify and to address problems in instruction and problems, if any, in implementing Title I parental involvement requirements and to address solutions to the identified problems;
2. Assistance in identifying and implementing professional development, instructional strategies and methods of instruction that are based on scientifically-based research and that have been proven effective in addressing the specific instructional issues that caused the school to be identified for improvement;
3. Assistance in analyzing and revising the school's budget so that the school's resources are more effectively allocated to the activities most likely to increase student academic achievement and to remove the school from school improvement status.

It is crucial that the district align its assistance with the comprehensive improvement plan being revised by the school. The revisions in the improvement plan and the district assistance should be based on a close analysis of the school's demographic and achievement data, such as subpopulation performance and a comprehensive needs assessment that identifies both strengths and weaknesses. This close analysis will enable the district to target more accurately available resources to address identified deficiencies. The goals, objectives and actions that result from the comprehensive analysis must realistically address the school's needs and systematically move it toward improvement.

District Obligation for the Option to Transfer (School Choice) and Supplemental Services

The district's obligation for choice-related transportation and supplemental educational services is equal to 20 percent of its district's Title I-A allocation unless a lesser amount is needed. Within the 20 percent, the district must spend:

1. An amount equal to 5 percent for choice-related transportation;
2. An amount equal to 5 percent for supplemental educational services; and
3. An amount equal to 10 percent for choice-related transportation or supplemental educational services or both, as the district determines.

The phrase "an amount equal to" means that the funds required to pay the costs of choice-related transportation and supplemental services need not come from the Title I allocation but may be provided from other federal, state, local and private sources. Title I improvement funds; regular Title I-A funds; Title V-A funds; and state/local funds may be used. Additionally, the district may use funds transferred to Title I-A from other federal education programs to pay such costs. Programs eligible for transfers include Title II-A Improving Teacher Quality Grants; Title II-D Educational Technology Grants; Title IV-A Safe and Drug-Free Schools and Communities Grants; and Title V-A Innovative Program Grants. A district not identified for improvement under Title I may **transfer up to 50 percent** of each fiscal year's funds for the applicable programs. A district identified for improvement under Title I may **transfer up to 30 percent** of each fiscal year's funds for the applicable programs. When a district is identified for improvement,

transferred funds must be used for district improvement activities. A district identified for corrective action may **not** transfer funds from one program to another.

The 20 percent must be applied to the total Title I-A allocation including any transferred funds. The 20 percent must be calculated before the district takes any reservations “off the top” of its Title I-A allocation for administrative costs, parent involvement, private school equitable participation or other purposes.

Some districts, in a given year, will not be required to provide supplemental educational services because they have no schools identified for Tier 2 consequences. In this situation, the district must spend the equivalent of 20 percent of the Title I-A allocation on choice-related transportation or a lesser amount that satisfies all of the demand from the parents of students attending identified schools.

School Responsibilities for a Title I School in Tier 1 Consequences

The process of school improvement begins with the school revising its comprehensive improvement plan to address the academic issues that caused it to be identified for improvement.

Revision of Comprehensive School Improvement Plan

A Title I school identified for Tier 1 consequences must revise its comprehensive improvement plan. The purpose of the plan is to improve the quality of teaching and learning in the school. The plan must continue throughout the time that the school is identified for improvement. The school must revise its plan in consultation with parents, school staff, district staff and outside specialists. If applicable, the school council should consider the recommendations of the scholastic audit/review and decide how to amend the plan in light of the scholastic findings. The revised plan must:

1. Incorporate strategies based on scientifically-based research that will strengthen the core academic subjects in the school and address the specific academic issues that caused the school to be identified for improvement and may include a strategy for the implementation of a comprehensive school reform model;
2. Adopt policies and practices concerning the school’s core academic subjects that have the greatest likelihood of ensuring that all groups of students (economically disadvantaged students; students from major racial and ethnic groups; students with disabilities; and students with limited English proficiency) enrolled in the school will meet the proficient level of achievement by 2014 as measured by CATS;
3. Provide an assurance that the school will spend at least 10% of its Title I school allocation for professional development that directly addresses academic achievement;
4. Specify how the professional development funds will be used to remove the school from its improvement status;
5. Establish specific annual, measurable objectives for continuous and substantial progress of each group of students that will ensure that all groups of students meet the proficient level of achievement by 2014 as measured by CATS;
6. Describe how the school will provide written notice about the identification to parents of each student enrolled in the school, in a format and, to the extent practical, in a language that the parents can understand;
7. Specify the responsibilities of the school, the district and the Kentucky Department of Education, including the technical assistance to be provided;
8. Include strategies to promote effective parental involvement in the school;

9. Incorporate, as appropriate, activities before school, after school, during the summer and during any extension of the school year; and
10. Incorporate a teacher-mentoring program.

The district must establish a peer review process for the revised school comprehensive improvement plan. Peer reviewers should include teachers and administrators from schools or districts similar to the one in improvement but significantly more successful in meeting the learning needs of their students. Staff with demonstrated effectiveness and recognized expertise in school improvement will be able to evaluate the quality of the plan and make suggestions. Once the peer review has been completed, the district must work with the school to make any necessary changes and must approve the plan as soon as it satisfactorily meets the requirements. The school must begin implementing the revised plan as soon as the district approves the plan.

Funds for Professional Development

As a part of revising its comprehensive school improvement plan, the **identified school must spend at least 10% of its Title I-A school allocation for each fiscal year that the school is in school improvement status for professional development.** The funds must be used to provide the teachers, paraprofessionals and principals high-quality professional development that:

- Directly addresses the academic achievement problem that caused the school to be identified for school improvement. In most cases, the professional development will focus on the teaching and learning process, such as increasing content knowledge, the use of scientifically based instructional strategies and the alignment of classroom activities with academic content standards and assessments.
- Meets the requirements for highly qualified teachers and paraprofessionals. The academic success of students correlates highly with the qualifications and skills of their teachers. **and**
- Is provided in a manner that affords increased opportunity for participating in the professional development.

District Responsibilities for a Title I School in Tier 2 Consequences

The district must continue all of the consequences in Tier 1 and must make supplemental educational services available for low-income students attending a school that does not make AYP after one year of school improvement (3 years of not making AYP). Parents of eligible students may continue to choose the option to transfer **or** may choose supplemental services.

Supplemental Educational Services

Supplemental educational services provide extra academic assistance for low-income students attending a school identified for Tier 2 consequences. The purpose of these services is to ensure that the students increase their academic achievement, particularly in reading, language arts and mathematics. These academic services may include assistance such as tutoring, remediation, and academic intervention. Instruction must take place outside the regular school day, such as before or after school, on weekends, or during the summer. Supplemental educational services must be of high quality, research based and specifically designed to increase student academic achievement. Parents select a supplemental service provider from the state-approved provider list.

District responsibilities focus on notifying parents about the availability of supplemental educational services, arranging for the services to be provided and monitoring the services for the purpose of improving academic achievement. Specifically, the district must:

1. Notify parents of the supplemental educational services option;
2. Give parents a list of state-approved providers and help parents choose a provider, if requested;
3. Determine how the lowest-achieving eligible students will be selected to receive services if not all eligible students can be served;
4. Agree, along with the parents and provider, on “achievement goals” for the student; **and** enter into an agreement with a provider selected by parents of an eligible student;
5. Assist the KY Department of Education in identifying potential providers within the district;
6. Provide the information the KY Department of Education needs to monitor the quality and effectiveness of the services offered by providers;
7. Protect the privacy of students who receive supplemental educational service.

Eligible children are those children from low-income families attending Title I schools identified for Tier 2 consequences. In most districts in Kentucky, low-income is based on eligibility for free/reduced meals. In circumstances where more students request services than the district can fund, the district must place a priority on serving those low-income students who are the lowest achieving. In this situation, the district should use objective criteria to determine the lowest-achieving students. For example, the district may focus services on the lowest-achieving eligible students in the subject area that caused the school to be identified for improvement. The services should be tailored to meet the instructional needs of eligible students to increase their academic achievement and help them attain proficiency in meeting the state’s achievement standards.

Parents are to be active participants in the supplemental educational services program. At the **local level**, parents will choose the supplemental educational service provider for their children from among the providers approved by the state. In general, the district must work to ensure parents have easy-to-understand information about supplemental educational services. The district must provide parents with information on the availability of supplemental educational services; the identity of approved service providers; and, at a minimum, a brief description of the services, qualifications, and demonstrated effectiveness of each provider. In addition, the district must assist parents in selecting a provider, if such help is requested. The district may provide additional information, as appropriate. Such communications with parents must occur at least annually and must be in an understandable and uniform format. To the extent possible, communications must also be in a language parents can understand.

The district may establish a reasonable deadline by which parents must request services. In establishing this timeframe, the district must ensure that the parents have sufficient time and information to make an informed decision about requesting supplemental educational services and selecting a provider. The district should work together with parents to ensure that parents have ample information, time, and opportunity to take advantage of supplemental educational services.

At the **provider level**, parents, the school district, and the provider chosen by parents must develop and identify specific academic achievement goals for the student, measures of student progress, and a timetable for improving achievement. In the case of a student with disabilities, or a student covered under Section 504, these decisions must be consistent with the student’s individualized education program under section 614(d) of the IDEA or with the student’s individualized education services under Section 504. All parents whose children receive supplemental educational services must be regularly informed of their student’s progress.

Once parents select a provider for their child, the provider must enter into an agreement with the district that includes the following:

1. Specific achievement goals for the student, which must be developed in consultation with the student's parents;
2. A description of how the student's progress will be measured and how the student's parents and teachers will be regularly informed of that progress;
3. A timetable for improving the student's achievement that, in the case of a student with disabilities, must be consistent with the student's individualized education program under section 614(d) of the Individuals with Disabilities Education Act and in the case of a student covered under Section 504, must be consistent with the provision of an appropriate education under Section 504;
4. A provision for termination of the agreement if the provider fails to meet student progress goals;
5. Provisions governing payment for the services by the district that may include provisions addressing missed sessions;
6. A provision prohibiting the provider from disclosing to the public the identity of any student eligible for or receiving supplemental educational services without the written permission of the student's parents; and
7. An assurance that supplemental educational services will be provided consistent with applicable health, safety and civil rights laws.

The district is encouraged to use cost-effective methods in designing the agreement. For instance, the district may want to design a generic agreement that can be tailored to a particular student and provider. A district that is an approved provider must prepare an agreement that contains the information listed. Although the district is not formally entering into an agreement with itself as the provider, the information is necessary so that parents know the achievement goals for the student, how progress will be measured and the timetable for improving the student's achievement. If the district fails to meet the student's progress goals, the parent should be able to request services from another provider, if one is available. If one is not immediately available, the district should contact the Kentucky Department of Education.

After consultation with the parents, the district and the provider must agree to a schedule of informing parents and the child's teacher(s) about student progress. The intent of this requirement is to ensure that students are improving their academic achievement and that instructional goals are being met. The district may, at its discretion, use funds reserved for supplemental education services to transport students to and from approved providers.

The provider must continue to provide supplemental educational services to students who are receiving the services until the end of the school year in which the services were first received. However, the sufficiency of funds and the intensity of services selected (such as the number of sessions per week) may limit the availability of services to a shorter period of time.

The district needs to be prepared to terminate agreements with the provider if the established goals and timetables are not met, or if the provider fails to comply with applicable health, safety, and civil rights laws. The process for terminating services should be written into the initial agreement between the district and provider. Parents may withdraw their child from services if they are not satisfied with the program. In such instances, the district may allow the parent to select another provider that school year, if funds are available.

The district may use Title I funds as well as other federal, state, local and private resources to pay for supplemental educational services required as part of the school improvement process. The per-child cost for supplemental educational services must be the lesser of the actual cost of the services or the per-child allocation of Title I funds to the district. The per-child allocation is determined by dividing the district's Title I-A allocation by the number of children from families below the poverty line (based on Census poverty data, not federal school lunch data) in the

district. This cap applies to the cost of instructional services only. The district may incur additional per-child costs related to the administration of supplemental educational services, transportation of students to a provider or appropriate accommodations for students with disabilities. The district may provide transportation to service providers but is not required to do so. Transportation costs to service providers may not be counted toward satisfying the district's obligation to spend up to an amount equal to 20 percent of its Title I-A allocation on choice-related transportation and supplemental educational services.

The district may arrange for paying a provider for services in a number of ways. The district may pay the provider directly for such services. Alternatively, the district may issue certificates or coupons to parents of an eligible student for them to "purchase" services from an approved provider. For example, a certificate may entitle parents to obtain, from a provider of their choice from the state's approved list, a certain number of hours of services or sessions for their student. As the student receives the services, the parent would redeem the certificate, which the provider would then submit to the district for payment. With any payment system, the district must still establish an agreement between the district and provider. Supplemental educational services must be provided until the school has made AYP for 2 consecutive years and is no longer identified for improvement.

School Responsibilities for a Title I School in Tier 2 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to implement the revisions in its comprehensive improvement plan. The school must continue to spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development.

District Responsibilities for a Title I School in Tier 3 Consequences

The district must continue all of the consequences in Tier 1 and Tier 2 and must take **corrective action** toward a Title I school if it fails to make AYP after two (2) years of improvement (4 years of not making AYP). If a Title I schools fails to make AYP after two (2) years of improvement, the district must take at **least one** of the following actions:

1. Replace school staff relevant to the improvement;
2. Institute and implement a new curriculum;
3. Significantly decrease management authority in the school;
4. Appoint an outside adviser;
5. Extend the school day or year; or
6. Restructure the internal organization of the school.

The district must publish and disseminate information regarding any corrective action taken at a school to the public and to the parents of each student enrolled in the school in an understandable and uniform format. The information should, to the extent practical, be provided in a language that the parents can understand. The information may be disseminated through such means as the Internet, the media and public agencies. The replacement of staff would require due process and would have to be done within the constraints of the appropriate Kentucky revised statutes.

School Responsibilities for a Title I School in Tier 3 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to implement the revisions in its comprehensive improvement plan. The school must continue to spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development.

District Responsibilities for a Title I School in Tier 4 and Tier 5 Consequences

The district must continue all of the consequences in Tier 1, Tier 2, Tier 3 and must **develop** a restructuring plan for a Title I school if it fails to make AYP after one year of corrective action (5 years of not making AYP). The district must prepare a plan and make necessary arrangements to carry out alternative governance arrangements for the school consistent with state law. If the school fails to make AYP after 2 years of corrective action (6 years of not making AYP), the district must then **implement** the restructuring plan. The plan must include one of the following:

1. Reopening the school as a public charter school.
2. Replacing all or most of the school staff (including the principal) that are relevant to the failure to make adequate yearly progress.
3. Entering into a contract with an entity, such as a private management company, with a demonstrated record of effectiveness, to operate the public school.
4. Turning the operation of a school over to the state educational agency if permitted under state law and agreed to by the state.
5. Any other major restructuring of the school's governance arrangement that makes fundamental reforms, such as significant changes in the school's staffing and governance, to improve student achievement in the school and that has substantial promise of enabling the school to make adequate yearly progress.

School Responsibilities for a Title I School in Tier 4 and Tier 5 Consequences

The consequences continue until the identified school has made AYP for 2 consecutive years. The school must continue to implement the revisions in its comprehensive improvement plan. The school must continue to spend at least 10% of its Title I school allocation for each fiscal year that the school is in school improvement status for professional development.

District Responsibilities for a District Identified for Improvement

All students that have been enrolled in the district for a full academic year are counted in the district AYP determination. The district is accountable based on the same measures used to determine if a school made AYP. Tested subpopulations of students that are not large enough to meet the minimum group size at an individual school will, in many cases, reach or surpass that number at the district level and be included in the calculation of whether or not the district made adequate yearly progress.

When a district does not make AYP for 2 consecutive years, there are requirements for revising the comprehensive district improvement plan.

Revisions to the Comprehensive District Improvement Plan

The purpose of the plan is to improve student achievement throughout the district. Therefore, the plan overall must identify actions that, if implemented, have the greatest likelihood of accomplishing this goal. Specifically, the plan must:

1. Incorporate scientifically based research strategies;
2. Identify actions with the greatest likelihood of improving student achievement;
3. Address professional development needs of staff;
4. Include specific measurable achievement goals and targets for each subpopulation of students;
5. Address the teaching and learning needs and academic problems of low-achieving students;

6. Incorporate, as appropriate, activities before school, after school, during the summer and during an extension of the school year;
7. Specify responsibilities of the state and district;
8. Include strategies to promote effective parental involvement in the schools served by the district.

When a district is identified for improvement, it must reserve at least 10% of its Title I-A allocation for professional development for instructional staff that is specifically designed to improve classroom teaching. The district must continue to reserve and use these funds for professional development for each fiscal year it is identified for improvement. In this 10% total the district may include the Title I-A funds that a school within the district reserves for professional development when it is identified for improvement. However, the district may not include in the total any part of the funds designated to help teachers who are not highly qualified become highly qualified. The district is identified for improvement until it has made AYP for 2 consecutive years.

State Responsibilities for a District Identified for Improvement

Notification to Parents and Technical Assistance

When a district is identified for improvement, the Kentucky Department of Education must promptly notify the parents of each student enrolled in the schools served by that district. In the notification the state must explain the reasons for the identification and how parents can participate in improving the district. In addition to notifying parents, the state must broadly disseminate its findings using methods such as the Internet, the news media and public agencies. If requested, the Kentucky Department of Education must provide or arrange for the provision of technical or other assistance to the district identified for improvement.

Corrective Action

The Kentucky Department of Education must take corrective action in a district that has not made AYP for 4 years. Because the healthy functioning of the district is so crucial to school and student academic success, the state may, at any time during the improvement process, identify the district for corrective action. The state must continue to provide technical assistance while instituting any corrective action. The state must take **at least one** of the following corrective actions, as consistent with state law, in a district that has not made AYP for 4 years:

1. Deferring programmatic funds or reduce administrative funds;
2. Instituting and fully implementing a new curriculum, including appropriate professional development;
3. Replacing district personnel relevant to the failure;
4. Removing particular schools from the jurisdiction of the district and establishing alternative arrangements for public governance and supervision of the schools;
5. Appointing a receiver or trustee to administer the affairs of the district in place of the superintendent and school board;
6. Abolishing or restructuring the district.
7. Authorizing students to transfer from a school operated by the district to a higher-performing public school operated by another district. If it offers this option, the state must provide transportation (or the costs of transportation) to the receiving school. This corrective action must be carried out in conjunction with at least 1 additional action.

The consequences continue until the district had made AYP for 2 consecutive years.

Resources

1. For questions about **adequate yearly progress (AYP)**, contact the Office of Assessment and Accountability at (502) 564-4394.
2. For information about becoming a **supplemental educational service provider**, go to the Kentucky Department of Education's web site at <http://www.education.ky.gov/>.
3. For additional resources regarding **district and school improvement under NCLB including sample letters, etc.**, refer to the CD-ROM *District and School Improvement Under NCLB*.

PARAEDUCATORS

Title I, Part A, NCLB Section 1119

PARAEDUCATORS

Title I, Part A, NCLB Section 1119

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Title I Paraprofessionals* that may be found at

<http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.

For the purpose of Title I Part A, a paraeducator is an employee who provides instructional support in a program supported with Title I, Part A Funds. Paraeducators are vital team members in the delivery of instructional and other services to students. Unfortunately, studies often show that paraeducators are used for assisting in teaching although their educational backgrounds may not qualify them for such responsibilities. The *No Child Left Behind Act* (NCLB) includes higher standards to ensure that students who need the most help are assisted by highly qualified paraeducators. The law also requires that high quality and ongoing professional development be provided for paraeducators working in programs supported by Title I, Part A funds. The training should enable paraeducators to assist children in meeting Kentucky's student academic achievement standards.

The *No Child Left Behind Act* (NCLB) addresses educational qualifying factors for paraeducators. Specifically, **all** paraeducators working in a program supported with Title I, Part A funds must have a secondary school diploma or its recognized equivalent. New employees must also meet the NCLB educational requirement listed below before they are hired to provide instructional support in a program supported with Title I, Part A funds. Paraeducators hired **on or before** January 8, 2002 and whose duties include instructional support in a program supported with Title I, Part A funds must also meet the NCLB educational requirement listed below by January 8, 2006.

No Child Left Behind (NCLB) Requirements

Paraeducators whose duties include instructional support and who work in a program supported with Title I, Part A funds must meet the NCLB educational requirement through **one** of the following:

1. Completed two years of study at an institution of higher education; **or**
2. Obtained an associate's (or higher) degree; **or**
3. Met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness).

The following are programs supported with Title I, Part A funds:

1. A **schoolwide program** uses Title I, Part A funds together with federal, state and local funds to upgrade the entire educational program of a school. A school that is served by Title I, Part A and at least 40 percent of the children are from low-income families may be a schoolwide program. Title I funds support all teachers and paraeducators. In a schoolwide program, the educational requirement applies to **all** paraeducators, without regard to whether the positions are funded with federal, state or local funds.
2. A **targeted assistance school** uses Title I, Part A funds only for programs that provide supplemental services to eligible children identified as having the greatest need for special assistance. A school that is served by Title I, Part A and is ineligible or chooses not to be a schoolwide program is a targeted assistance school. In a targeted assistance school, the

educational requirement applies to paraeducators who are paid with Title I, Part A funds, but not to paraeducators paid with state or local funds.

Individuals Required to Meet the NCLB Educational Requirement

According to guidance from the U.S. Department of Education:

1. Paraeducators with instructional duties in any program supported by Title I, Part A funds must meet the NCLB educational requirement. Individuals who have both instructional and non-instructional duties must meet the NCLB educational requirement because they carry out some instructional support duties.
 - For a schoolwide program, **all** paraeducators with instructional duties must meet the NCLB educational requirement without regard to the source of funding of the positions. Paraeducators who provide instructional support to special education students and work in a schoolwide program must meet the NCLB educational requirement without regard to the source of funding that supports the positions.
 - For a targeted assistance school, **only** paraeducators with instructional duties who are paid with Title I, Part A funds must meet the NCLB educational requirement.
2. Paraeducators employed by the district to provide Title I, Part A instructional services to eligible private school students must meet the NCLB educational requirement.
3. Individuals who had been performing non-instructional duties and then become instructional paraeducators must meet the NCLB educational requirement. As existing employees of the district, the individuals would have until January 8, 2006 to demonstrate competency through post-secondary education or a formal academic assessment.

Individuals Not Required to Meet the NCLB Educational Requirement

According to guidance from the U.S. Department of Education:

1. Paraeducators who are proficient in English and a language other than English and act solely as translators for limited English proficient students are not required to meet the NCLB educational requirement.
2. Paraeducators who work as interpreters for the deaf and hard of hearing are not required to meet the NCLB educational requirement.
3. Paraeducators with duties that consist solely of conducting parental involvement activities are not required to meet the NCLB educational requirement.
4. Paraeducators with instructional duties in a targeted assistance school that are funded through state or local funds are not required to meet the NCLB educational requirement.
5. Individuals who work solely in non-instructional roles, such as food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not required to meet the NCLB educational requirement.
6. Individuals who provide non-instructional support to special education students are not required to meet the NCLB educational requirement. This includes individuals who solely provide personal care services or serve as bus or health aides for special education students.
7. Paraeducators paid with funds under Title I, Part B (Student Reading Skills Improvement Grants), Title I, Part C (Education of Migratory Children) or Title I, Part D (Programs for Children and Youth who are Neglected, Delinquent, or At-Risk) are **not** required to meet the NCLB educational requirement unless they work in a schoolwide program school or are paid, in whole or part, with Title I, Part A funds.
8. Individuals working in early childhood programs (such as Head Start or State funded preschool programs) that are physically located in a Title I, Part A school but are not a part

of a schoolwide program and are not funded with Title I, Part A funds are **not** required to meet the NCLB educational requirement. However, the educational requirement would apply to paraeducators working in an early childhood program that is jointly funded with Title I, Part A funds and the paraeducator is paid with Title I, Part A funds.

9. Paraeducators working in schools (or districts) that do not receive Title I, Part A funds are **not** required to meet the NCLB educational requirement.
10. AmeriCorps volunteers and other volunteers are not considered employees of districts and are **not** required to meet the NCLB educational requirement. However, even though the educational requirement does not apply, the district should make every effort to ensure that AmeriCorps volunteers who provide instructional support in a Title I program have the skills necessary to assist effectively in instructing reading, writing and mathematics.
11. Individuals working in 21st Century Community Learning Center Programs are **not** required to meet the NCLB educational requirement. However, the requirement would apply to paraeducators paid with Title I, Part A funds in a 21st Century after-school program funded jointly with Title I funds in a targeted assistance school and to paraeducators working in a 21st Century after-school program that is part of a Title I schoolwide program. The educational requirement does not apply to staff of 21st Century programs that are not employees of the district.

New and Existing Employees

New employees must meet the NCLB educational requirement in order to be hired by the district if their duties include instructional support in a program supported with Title I, Part A funds. Existing employees with instructional duties in a program supported with Title I, Part A funds have until January 8, 2006, to meet the educational requirement. Persons that work as paraeducators in a non-Title I program and are then transferred to a Title I, Part A program are **not** considered new employees. A district has discretion to define its policies for distinguishing “new” and “existing” paraeducators in the case of paraeducators hired before January 8, 2002 but laid off and subsequently rehired after January 8, 2002. These policies might say, for example:

1. Paraeducators who are “pink-slipped” at the end of one school year and then rehired at the beginning of the next school year, with the result that they have continuous years of employment, are considered existing paraeducators, not new employees.
2. Individuals who have a break in service and are re-hired at some later point are considered new employees.

To provide consistency and ensure that all paraeducators are highly qualified, districts may choose to develop a policy in which **all** paraeducators with instructional duties are required to meet the NCLB educational requirement.

Two Years of Study and Associate’s Degree

A paraeducator may complete “two years of study at an institution of higher education” to meet the NCLB educational requirement. “Two years of study” means the equivalent of two years of full-time study as defined by the institution. For some institutions that may mean 12 credit hours per semester (requiring a total of 48 credit hours), while in others it may mean 15 credit hours a semester (requiring a total of 60 credit hours). A paraeducator may obtain an associate’s (or higher) degree to meet the NCLB educational requirement. The Kentucky Community and Technical College System (KCTCS) has developed an associate’s degree for paraeducators. While a paraeducator is not required to take a specific course of study, a paraeducator should be able to demonstrate knowledge of and the ability to assist in instructing in the areas of reading, writing, and mathematics or in readiness.

A district may count continuing education credits (CECs) toward the two years of study if the CECs are part of an overall training and development program plan and an institution of higher education accepts or translates them to course credit.

Formal Academic Assessments

For paraeducators who have not completed two years of post-secondary education or have not obtained an associate's degree, a formal state or local academic assessment may be used to meet the NCLB educational requirement. The assessment must assess the paraeducator's knowledge of and the ability to assist in the instruction of reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness). The purpose of the academic assessment is to demonstrate that paraeducators have the appropriate knowledge and ability to assist in instructing students and are competent in required instructional techniques and academic content areas.

Allowable Duties for Paraeducators

Paraeducators providing instructional support in a program supported with Title I, Part A funds must work under the **direct supervision** of a teacher. For a schoolwide program, **all** paraeducators with instructional duties must work under the direct supervision of a teacher. For a targeted assistance school, **only** paraeducators with instructional duties who are paid with Title I, Part A funds must work under the direct supervision of a teacher. Direct supervision of a teacher is considered to be:

1. The teacher prepares the lessons and plans the instructional support activities the paraeducator carries out and evaluates the achievement of the students with whom the paraeducator is working; and
2. The paraeducator works in close and frequent proximity with the teacher.

A program where a paraeducator provides instructional support and a teacher visits a site once or twice a week but otherwise is not in the classroom would be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher. A program where a paraeducator works with a group of students in another location while the teacher provides instruction to the rest of the class would also be inconsistent with the requirement that paraeducators work in close and frequent proximity to a teacher.

Because paraeducators provide instructional support, they should **not** be providing planned direct instruction or introducing to students new skills, concepts or academic content. Paraeducators working in a program supported with Title I, Part A funds may provide the following services, under the supervision of teachers or other licensed personnel:

1. Provide one-on-one tutoring for eligible students, if the tutoring is scheduled at a time when a student would **not** otherwise receive instruction from a teacher;
2. Assist with classroom management such as by organizing instructional materials;
3. Provide instructional assistance in a computer laboratory;
4. Conduct parent involvement activities;
5. Provide instructional support in a library or media center;
6. Act as a translator; **or**
7. Provide instructional services to students under the direct supervision of a highly qualified teacher.

Paraeducators who provide services to eligible private school students and are employed by the district must be under the direct supervision of a highly qualified public school teacher throughout the duration of the services/program being offered.

Paraeducators hired by a third-party contractor to work in a Title I program must work under the direct supervision of a teacher. That teacher does not have to meet the teacher qualification requirement if the third party contractor also employs the teacher.

Paraeducators providing instructional support in a program supported with Title I, Part A funds may assume limited duties that are assigned to similar personnel who are not working in a program supported with Title I, Part A funds. The limited duties include duties beyond classroom instruction or duties that do not benefit participating children. The amount of time spent on limited duties must be the same proportion of total work time as that of instructional staff at the same school.

Funding Professional Development

Several federal programs provide funds that local school districts may use to provide professional development for paraeducators.

1. Title I, Part A funds may be used to support ongoing training and professional development to assist teachers and paraeducators working in a program supported with Title I, Part A funds. Title I, Part A funds may also be used for professional development to help paraeducators become certified and licensed teachers.
2. Title II, Part A (Teacher Quality Program) funds may be used to provide professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraeducators concerning effective instructional strategies, methods and skills and use of challenging content standards to improve teaching practices and student academic achievement. Title II-A funds may also be used for professional development to help paraeducators become certified and licensed teachers.
3. Title III, Part A (English Language Acquisition) funds may be used to provide professional development for teachers and other instructional personnel providing instruction to students need English language acquisition and language enhancement.
4. Title V, Part A (Innovative Programs) funds may be used to provide professional development for teachers and other school personnel as a part of reform strategies.

PROFESSIONAL QUALIFICATIONS OF TEACHERS NOTIFICATION TO PARENTS

NCLB Title I-A, Sections 1111 and 1119

PROFESSIONAL QUALIFICATIONS OF TEACHERS NOTIFICATION TO PARENTS

NCLB Title I-A, Sections 1111 and 1119

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Improving Teacher Quality (Title II)* that may be found at <http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.

At the beginning of each school year, districts should notify parents in Title I schools of their right-to-request information regarding the professional qualifications of their child's teacher(s). Also at the beginning of each school year, Title I schools should monitoring the time in which students are taught by a teacher of a core academic subject who is not "highly qualified." After four consecutive weeks, the school should notify parents. The notice applies for four consecutive weeks at any time during the school year. Each year the principals of Title I schools must certify in writing that the schools are complying with NCLB's mandate for highly qualified teachers.

Districts should designate individuals to go to the Education Professional Standards Board's web site, if they haven't already done so, and use the Highly Qualified Teacher Calculator to determine if the teachers in the district are considered "highly qualified" for the core academic course(s) they teach. The calculator and definition of "highly qualified" teacher may be accessed at <http://www.kyepsb.net/NCLB.html>. "Highly qualified" means meeting the following NCLB requirements:

1. Hold at least a bachelor's degree;
2. Hold full Kentucky certification (emergency, probationary and adjunct instructor certifications are not full Kentucky certifications); **AND**
3. Demonstrate competency in each of the core academic subjects taught.

All questions concerning the definition of a "highly qualified" teacher, should be directed to the Education Professional Standards Board; please contact Wendell Cave, EPSB, at (502) 564-4606 or email to: wendell.cave@ky.gov.

District Requirement for Notification to Parents

At the beginning of **each school year**, a district that accepts *Title I, Part A* funding must notify parents of students in Title I schools that they may **request information** regarding their child's teacher(s). The district must provide the parents on request, information regarding the professional qualifications of the student's teacher(s). The information must include, at a minimum, the following:

1. Whether the teacher has met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction;
2. Whether the teacher is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree; and
4. Whether your child is provided services by paraeducators, and if so, their qualifications.

The district is only required to notify parents in Title I schools. The district should personalize the notification as much as possible. The district may also include other information such as the number of years of teaching experience. The notification should contain the district contact name, phone number and the procedure to receive information about their child's teachers. The notification to parents may come in the form of the following:

1. Letter to all parents (on district letterhead from the superintendent or designee);
2. Notification in student handbook that is given to all parents;
3. Prominent article in newsletter that is sent to all parents;
4. Information on district/school web site. (This should be coupled with another method of notification since not all parents have access to computers.)

The district must provide the notification and the information about teacher qualifications:

1. In a timely manner.
2. In a uniform and understandable format, including alternative formats upon request; and
3. To the extent practicable, in a language parents can understand.

An excellent source of sample letters may be found through TransACT. TransACT® No Child Left Behind Parent Communication Center™ (NCLB-PCC) is a comprehensive, Internet-based subscription service providing school administrators, educators and staff with access to letters and forms. This powerful technology tool is designed to help a district meet the *No Child Left Behind Act of 2001* and Office for Civil Rights requirements, enhance multilingual communication and save development time and resources. KDE offers this comprehensive online service to school districts at no cost. The superintendent in each district has information on accessing the sample letters in TransACT.

Sample letters are attached to this document. Personalize the letters to meet the needs of the district.

1. **Notification of Right to Request Teacher Qualification** – This letter notifies parents that they may request information regarding their child's teacher(s).
2. **Teacher Qualification Response to Parents** – This letter is in response to a parent's request for information about their child's teacher(s). Repeat the chart as needed for other teachers. Add other information the district wishes to provide such as the number of years of experience. The letter also contains a general statement about paraeducators in the district. Change this as appropriate.

School Requirement for Notice to Parents

In addition to the district requirement, each Title I school must provide each parent timely **notice** that the parent's child has been assigned, or has been taught for four or more consecutive weeks by, a teacher of a core academic subject **who is not "highly qualified."** The school should check with the district to see which teachers have not met the NCLB qualification requirements.

The notice applies to all teachers in core academic subjects, including substitute teachers, who have not met the NCLB requirements. "Core academic subjects" are English; reading or language arts (Kentucky's "reading/writing"); mathematics; science; foreign languages; civics and government (Kentucky's "political science"); economics, history, and geography (all of which fall under Kentucky's social studies"); and arts (Kentucky's "art" and "music"). The academic area in which student credit is assigned determines whether or not a course is a "core academic subject."

The notice should be worded carefully in order to provide information and meet the intent of the law without confusing students, parents and the teacher(s) involved. The federal law and regulations simply state that schools must notify parents; they do not state that parents should be given the choice to move their child to another classroom. A sample **notice of teacher status** is attached to this document. In the notice, the school principal should do the following:

1. Clarify for parents that while the teacher does not meet the NCLB requirements, the teacher does have the skills and experience needed to teach the child.
2. Note that teachers hired before SY 2002-03 have until the end of SY 2005-06 to meet the requirements. Districts that are considered rural under the Small Rural School Achievement (SRSA) program have additional time to meet the requirements.
3. For a substitute teacher, note that he/she is not required to meet the NCLB requirements and that the person does have the credentials to serve as a substitute teacher under Kentucky law.
4. Assure parents that the teacher is involved in training and coursework in order to meet the requirements.
5. Include the school and district name and phone number that a parent may contact to request the qualifications of the teacher.

**Sample
Notification of Right to Request Teacher Qualifications**

Dear Parent or Guardian:

The educators in _____ County/Independent schools are committed to providing a quality instructional program for your child. This letter is just one of the ways of keeping you informed of the educational commitment of our schools and our district.

Our district receives federal funds for Title I programs as a part of *the No Child Left Behind Act* (NCLB). Under NCLB, you have the right to request information regarding the professional qualifications of your child's teacher(s). If you request this information, the district will provide you with the following:

1. Whether the teacher has met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction;
2. Whether the teacher is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree; and
4. Whether your child is provided services by paraeducators, and if so, their qualifications.

If you would like to request this information, please contact _____ by phone at _____ or by email at _____. Please include your child's name, the name of the school your child attends, the names of your child's teacher(s) and an address or email address where the information may be sent. Thank you for your interest and involvement in your child's education.

Sincerely,

Superintendent (or Designee)

Sample Teacher Qualification Response to Parents

Name of Student _____ Date _____

Dear Parent or Guardian:

Thank you for your recent request for information regarding the professional qualifications of your child's teacher(s). Below is information for your child's teacher(s).

Teacher		Class
Yes	No	Teacher Qualifications
		1. Has the teacher met the state requirements for licensure and certification for the grade levels and subject matters in which the teacher provides instruction?
		2. Is the teacher teaching under emergency or other provisional status through which state qualification or licensing criteria has been waived?
		3. The college major and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree:

The *No Child Left Behind Act* (NCLB) also requires that you be informed whether your child is provided services by paraeducators and, if so, their qualifications. In our district all paraeducators with instructional duties working in programs supported with Title I funds have passed the Kentucky Paraeducator Assessment; have an associates degree or higher or have completed at least 48 hours of postsecondary education.

Thank you for your interest in the quality of your child's education. Your continued involvement is an important part of your child's academic success. If you have questions about the information that has been provided, please contact me by phone at _____ or by email at _____.

Sincerely,

(Title of person providing information)

Sample Notice of Teacher Status

Dear Parent or Guardian,

The federal *No Child Left Behind Act* (NCLB) requires that by the end of SY 2005-06, teachers who teach core academic subjects meet the following requirements:

1. Hold at least a bachelor's degree;
2. Hold full Kentucky certification; and
3. Demonstrate competency in each of the core academic subjects taught.

Schools are required to notify parents if a teacher who does not meet the NCLB requirements has taught their child for four or more consecutive weeks. This notice applies to all teachers in core academic subjects in Title I schools. The core academic subjects are English, reading/writing, mathematics, science, foreign languages, political science, social studies, art and music. Even though a substitute teacher is not required to meet NCLB requirements and does have the credentials to serve as a substitute teacher under Kentucky law, the substitute must still be included in the notice to parents.

The following teacher(s) who teach your child do not currently meet the NCLB requirements.

Teacher	Course Taught	NCLB Requirement(s) Not Met

These teachers do have the skills and experience to teach your child; they simply do not meet the NCLB requirements. Keep in mind that these teachers have until the end of the 2005-06 school year to meet the requirements. These teachers are involved in training and/or coursework to satisfy the requirements.

Please contact me by phone at _____ or by email at _____ if you have any questions about this letter. Please contact _____ by phone at _____ or by email at _____ to request the specific qualifications of these teachers.

Sincerely,

Principal

HOMELESS EDUCATION

NCLB, Title X, Part C

HOMELESS EDUCATION

NCLB, Title X, Part C

The Stewart B. McKinney-Vento Homeless Assistance Act was the first and remains the only major federal legislative response to homelessness. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Education for Homeless Children and Youth Program* that may be found at

<<http://www.ed.gov/programs/homeless/legislation.html?exp=0>> .

Purpose of Homeless Education

Homeless children and youth are to be provided services comparable to those received by other students. The services include transportation services and education programs for which students meet eligibility criteria. These school services may include those provided under Title I or similar state or local programs; programs for students with disabilities; programs for students with limited English proficiency; vocational or technical programs; gifted and talented programs; school nutrition programs; and transportation.

The Kentucky Department of Education (KDE) has identified approximately 8000 homeless children. The mission of the Homeless Education Program of the KDE is to be a supporter and nurturer of homeless children and youth; to help them achieve educational success and to prepare them for the challenges of adult life.

The Homeless Education Program includes competitive grants. Schools awarded the Stewart B. McKinney-Vento Assistance Act include the following school districts: Ashland, Bell, Boyd, Carter, Christian, Clark, Covington, Fairview, Fulton Co., Greenup, Hopkins, Jefferson, Kenton, McCracken, Paducah, Pike, Rowan, and Whitley. The grants are awarded on a three-year cycle beginning July 1, 2003.

Definitions

Enroll and Enrollment: include attending classes and participating fully in school activities.

Unaccompanied Youth: includes a youth not in the physical custody of a parent or guardian.

School of Origin: the school the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled.

Dispute Resolution: a process or procedure that the parents or unaccompanied youth can use to resolve problems involving educational placement of homeless children/youth.

Records: any information or documentation ordinarily kept by the school such as immunization, medical records, birth certificates, guardianship papers, academic records and evaluations for special services or programs.

Placement Choice: decision for placement is made regardless of whether the child is living with the homeless parents, or has been temporarily placed elsewhere.

Homelessness as defined by the Stewart B. McKinney-Vento Assistance Act serves children ages three (3) to twenty-one (21) who meet the definition of homelessness from one of the following categories:

1. Children who lack a fixed, regular and adequate night-time residence;
2. Children who have a primary nighttime residence in a public or private shelter which may include emergency family shelter, runaway youth shelter; domestic violence/spouse abuse shelter; subsidized hotel, motel or temporary quarters;

3. Children and youth placed in foster homes only if they were temporarily placed there for lack of shelter space;
4. Children residing in a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings;
5. Children who temporarily reside with relatives or friends due to their homeless condition;
6. Sick or abandoned children staying in hospitals who would otherwise be released if they had a place to go;
7. Migratory children or youth, only if they are staying in accommodations that do not meet health and safety standards and/or who do not have a permanent place to live elsewhere.

Identifying Homeless Preschoolers

Local liaisons can identify preschool-aged homeless children by working closely with shelters and social service agencies in their area. In addition, the liaison should work with school personnel, who can inquire, at the time they are enrolling homeless children and youth in school, whether the family has preschool-aged children. The district liaison should also collaborate with the school district special education program. The Individual with Disabilities Education Act (IDEA) requires that highly mobile children with disabilities, such as migrant and homeless children who are in need of special education and related services, are located, identified and evaluated. Additionally, IDEA requires that homeless preschoolers and all children be included in the "Child Find" process for early identification of special education needs.

The district liaison should work with preschool program staff to remind them how important their services are for homeless children and to inform them of how waiting lists often create barriers for homeless families who wish to enroll their children. Some preschool programs keep slots open specifically for homeless children.

Enrollment and Attendance Statistics

The FY 2000 Report to Congress stated that 87 percent of homeless K-12 children and youth are enrolled in school. However, only 77 percent attended school regularly. Less than 16 percent of eligible preschool aged children are enrolled in preschool programs.

U.S. Department of Education's McKinney-Veto Report to Congress or Fiscal Year 2000 References, Appendix G

District Requirements

1. The district must meet all federal requirements regardless of whether they receive McKinney-Vento Grant monies or not.
2. The district must set-aside monies for homeless students on the Title I Ranking Report for homeless students in non-Title I schools.
3. A district receiving Stewart B. McKinney-Vento Grant must set-aside Title I, Part A, funds. These funds must be reflected in the Title I Ranking Report.
4. The district must designate an appropriate staff person to serve as the liaison for homeless children and youth. The liaison may have other duties that include but are not limited to coordinating other federal programs.
5. The district must ensure that homeless children and youth are identified by school personnel and through other entities and agencies.
6. The district is to inform parents or guardians of educational and related opportunities available to their children and must provide them with meaningful opportunities to participate in the education of their children.
7. The district must mediate all enrollment disputes in accordance with the enrollment disputes provision.
8. The district must assist unaccompanied youth in placement/enrollment decisions, consider the youth's wishes in these decisions, and inform the youth of the right to appeal such decisions under the enrollment disputes provision.
9. The district must immediately enroll unaccompanied youth in school, even if there is a dispute over school enrollment or placement.
10. The district must assist children and youth in obtaining necessary immunizations or medical records.
11. The district must collaborate and coordinate with state coordinators, community and school personnel, who are responsible for the provision of education and related services to homeless children and youth.
12. The district must fully inform the parent/guardian of a homeless child/youth or any unaccompanied youth of all transportation services available, including transportation to the school of origin.
13. The district must ensure that the school selected for attendance immediately enrolls the child/youth in school, even if the he or she lacks records normally required for enrollment. Such records include the previous academic records, medical records, proof of residency, or other documentation.
14. The district must immediately contact the last school attended to obtain relevant academic and other records.
15. The district must keep records normally kept by the school. These records include immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs. These records must be available in a timely fashion, when a child/youth enters a new school district and in a manner consistent with the Family Educational Rights Privacy Act of 1974.
16. At the request of the parent/guardian, the district must ensure that transportation is provided to and from the school of origin. In the case of an unaccompanied youth, the liaison may request this service.
17. If the homeless student moves to another school district but continues to attend the school

of origin, both districts must decide which district is responsible for transportation costs to the school of origin. If the districts cannot agree, they must share costs and responsibilities equally.

18. The district may use funds for professional development to heighten awareness of the plight of homeless children for his/herself and school employees.
19. Under the school nutrition program homeless children are automatically eligible for free and reduced lunch.

Title I and Homeless Children and Youth

NCLB, Title I, Part A, Section 1114, 1115, 1118

The following are key provisions in Title I, Part A, relating to homelessness:

- It targets those students most at risk of failing in school.
- A homeless child/youth attending any school in the district is eligible for Title I services.
- Districts must set-aside funds to provide comparable services to children attending schools not served by Title I, Part A, including providing educationally related support services to children in shelters and other locations where children may live.
- Each district Title I coordinator must include a description on the Title I Ranking Report of the services that will be provided to homeless children.
- Children/youth who are in homeless situations benefit from Title I services and programs. However, additional Title I funds may be needed to address specific needs of children who are homeless or highly mobile. For example, an excellent reading program implemented in a schoolwide or targeted assistance school will not be effective for children/youth who are unable to attend school regularly. An appropriate expenditure of Title I funds would be to remove barriers that prevent regular attendance or provide additional support, such as tutorial, before and after school and/or summer school programs. Funds other than those set-aside by Title I, Part A, must be used to provide transportation to school of origin.
- District homeless liaisons, are now required to be appointed in every school district, and district Title I coordinators must communicate and collaborate on an ongoing basis with the liaison to identify the needs of homeless children/youth, review resources, and plan ways to address needs.

The National Center for Homeless Education at SERVE provided the following strategies for using Title I, Part A, funds for students experiencing homelessness. These strategies are **suggestions** that may be helpful in addressing the needs of homeless students.

- Establish a formula to allocate Title I set-asides for homeless children/youth.
- Use Title I funds (including set-aside funds) to support the position of a full-time LEA homeless liaison so that the liaison's duties can be more fully accomplished.
- Use Title I funds to meet basic needs of students experiencing homelessness (clothing, supplies, health) so that they may participate more fully in school.
- Use Title I funds for parent involvement that makes a special effort to reach out to parents in homeless situations.
- Use set-aside funds for after school and/or summer programs.

- Use set-aside funds for outreach services to children/youth living in shelters, transitional living programs, motels, and other temporary residences.
- Use Title I funds for research based programs that benefit highly mobile students.
- Collect data on students experiencing homelessness as part of the overall district-wide data collection system.
- Coordinate Title I and Stewart B. McKinney-Vento funds to provide a comprehensive program for children at risk of failure, ensuring that specific needs of children experiencing homelessness or high mobility are met.

Strategies to facilitate collaboration and coordination between Title I, Part A, and Stewart B. McKinney-Vento include the following. These strategies are suggestions that may be helpful in addressing the needs of homeless students.

- Ensure that district homeless liaisons attend Title I conferences and professional development and that Title I coordinators attend homeless education conferences and in-service
- Share Title I and Homeless Education handbooks with each program.
- Collect and share across the district concrete data on the needs of homeless children/youth.
- Involve Title I coordinators in structured coalition building with homeless education programs and organizations that serve homeless families and unaccompanied homeless youth, and establish common goals.
- Initiate district efforts to make accommodations for homeless children/youth as necessary in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school.
- Involve homeless education program staff in school improvement issues; make sure that addressing the needs of highly mobile students is included in the Comprehensive School Improvement Plans, not addressed as a separate issue.
- Emphasize that coordination and sharing of resources is beneficial to the district as a whole because serving homeless children/youth will increase school achievement, lower truancy and dropout rates, and increase overall funding to the district.
- Determine what funding is available to serve homeless children/youth and how it is being used. Identify needs and develop a cross-program approach to address unmet needs.
- Establish and widely disseminate information on district-wide policies, procedures, and guidelines to identify and serve homeless children/youth.
- Ensure district homeless liaison representation on the appropriate district planning committee.
- Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

Websites – Addressing Homelessness

The following websites contain resources that may be useful to districts and schools in developing and implementing plans to address homelessness:

U.S. Interagency Council on Homelessness www.ich.gov

This site contains state and local information on mainstream resources available to assist people who are homeless. News and updates, a library of resources, a phone list of clearinghouses, and links to member organizations and other helpful sites are also available.

National Alliance to End Homelessness www.naeh.org

This site includes statistics, policy and legislative information, publications, best practices and profiles, fact sheets, links, and other resources on homelessness.

National Health Care for the Homeless Council www.nhchc.org

This site has a policy and advocacy section which provides several papers and legislative updates online. Other sections include research, clinical resources, training and education, and publications such as newsletters and fact sheets.

National Resource Center on Homelessness & Mental Illness www.nrchmi.samhsa.gov/

This site includes annotated bibliographies and a searchable database of resources related to homelessness and mental illness, as well as fact sheets, statistics, training and technical assistance information, referral lists and links to other sites.

National Law Center on Homelessness and Poverty www.nlchp.org

This site includes fact sheets on housing, health, and quality of life issues. It also provides a list of its publications and links to other sites.

Technical Assistance Collaborative www.tacinc.org

This site provides information on a full range of federal and mainstream housing programs and policies. These programs expand on affordable housing for people with disabilities and who may be homeless. The site also features a newsletter and links to other sites.

Corporation for Supportive Housing www.csh.org

This site includes links to local programs, a legislative action center, a resource page, and a contacts list. Publications and information on supportive housing initiatives are available online as well.

NEGLECTED INSTITUTIONS

NCLB Title I, Part A, Section 1113

TITLE I SERVICES TO CHILDREN IN LOCAL INSTITUTIONS FOR NEGLECTED CHILDREN

NCLB Title I, Part A, Section 1113

1. **Requirement** – A district must provide for the educational needs of children in identified local institutions for neglected children. **See attached list to determine the locations of the institutions for neglected children.**
2. **Definition** – Children who reside in a local institution for neglected children are counted as eligible formula children in the Title I, Part A allocation. The Cabinet for Families and Children identifies the institutions and their numbers of formula children, based on a child count taken in October. The children in these institutions must receive some type of Title I educational service. Any local institution for neglected children not included in the count may also be served at the discretion of the DISTRICT. **A local institution for neglected children is not considered a private school.**
3. **Funds** – The amount of funds generated by children in local institutions for neglected children becomes a part of the Title I, Part A allocation. Before allocating funds to public schools, a district should consult with officials from the identified institutions and then reserve funds that are reasonable and necessary to serve children in local institutions for neglected children and those neglected children who are in community day school programs. Services should be comparable to those provided to children in participating Title I schools. If there is more than one institution in the district, the needs of each institution's educational program should be considered in determining the amount of funds for services to each institution. The number of children that reside in each institution on an average basis may also be used in determining the amount of funds to be expended for services to a particular institution.
4. **Consultation** – The district must consult with officials from the institution(s) to determine the type of services, including conducting a needs assessment. **Documentation must be on file in the district Title I office that demonstrates institution officials are being consulted in a timely manner.**
5. **Services** – Services are provided to any children residing in a local institution for neglected children. Particular children are **not** identified for services since these children are very mobile. The chart in the Title I Ranking Report showing the districts set-asides must contain a brief description of Title I educational services for children in local institutions for neglected children and neglected children in community day school programs. A needs assessment must be conducted to determine Title I services. Many students in the institution are served by Title I in the public schools they attend. The following are examples of Title I services that may be provided to children in the institution.
 - Tutors work with students in addition to the assistance being provided to children who are attending public schools and receiving Title I services.
 - Counseling/peer mediation services help children in the transition from the institution to school.
 - Computers and software assist children with homework, reinforce concepts, etc.
 - Books and materials such as encyclopedias, dictionaries, high interest/low vocabulary books, etc. provide students with additional assistance. The books and materials cannot be religiously affiliated.

6. **Religiously Affiliated Institutions** – It is allowable for Title I personnel to go on the property to provide Title I educational services.
7. **Evaluation** – There is no separate evaluation for children in local institutions for neglected children for Title I accountability purposes.
8. **Other** – If a district is unable or unwilling to provide services to children in local institutions for neglected children, the state must reduce the district's allocation by the amount generated by the neglected children. The Kentucky Department of Education (KDE) may transfer the funds to another district that agrees to assume educational responsibility for the neglected children. The KDE may retain the funds if the KDE assumes educational responsibility for the neglected children. If the institution closes and the children are transferred to an institution in another district, the KDE must adjust the allocations of the two districts to reflect the transfer.

KY 2004-05 Local Neglected Institutions		
District and Institution	District Caseload	Facility Caseload
Adair County	8	
Adanta/Westwood Group Home Chad Bivens 270-384-3898		8
Bardstown Independent Schools	7	
Nelson Co. Community Based Residential Nita Conner 502-833-4070		7
Barren County	23	
Kinderhaven Spectrum Care Angela Radar-Todd 270-678-1042		11
Spectrum Care Academy Tonya Bennett 270-678-4706		12
Beechwood Independent Schools	23	
Catholic Children's Home Sister Mary Ann Kathman 859-331-2040 Ex 211		23
Boone County Schools	16	
Maplewood Children's Home Kirk Kavanaugh 859-334-3550		16
Boyd County Schools	7	
Community Presence, Inc. Ted Griffith 606-475-9122		7
Campbell County Schools	41	
Campbell Lodge Boys Home Michael Schroth 859-781-1214		25
Holly Hills Children's Home Constance Wong 859-635-0500 Ex 212		16
Carter County Schools	15	
Community Presence, Inc. Ted Griffith 606-474-7662		15
Clay County Schools	8	
Calvary Baptist Children's Home Donna Reid 606-598-4053		8
Covington Independent Schools	49	
Brighton Center Katie Garrett 859-491-8203		8
Brighton Homeward Bound Anita Prater 859-491-8303 Ex 2103		7
Children's Home of Northern Kentucky Renaie Butcher 859-261-8768 Ex 3100		34
Danville Independent Schools	20	
Woodlawn Children's Campus Lee Martin 859-936-3481		20
Daviess County Schools	48	
Valley School Kaye Castlen 270-689-6775		48

KY 2004-05 Local Neglected Institutions		
District and Institution	District Caseload	Facility Caseload
Fayette County Schools	15	
Coleman House Anita Cummings 859-254-0361		2
Metro Group Home Theodrick Hersey 859-259-3212		2
Florence Crittenden Home Mary Venezie 859-252-8636		8
Lexington Community Based Residential Rebecca Parrott 859-277-3238		3
Graves County Schools	11	
New Pathways for Children Tracey Wyatt 270-674-6061		11
Hardin County Schools	27	
Baptist Youth Ranch C.A. Brown 270-737-3888		11
Community Youth Services Mary Lynne Healey 270-351-6852		6
Kentucky Homes for Children Sheryl CJ Jamison 270-369-7380		10
Jefferson County Schools	256	
Bellewood Presbyterian Home for Children Robert Wilson 502-245-4171		27
Brooklawn, Inc Frances McCormick 502-515-0460		93
Community Youth Services Mary Lynne Healey 270-351-6852		4
St. Joseph Catholic Orphan Society Robert Wilson 502-893-0241		11
Wildflower Child Care Kimberly Brown 502-937-4879		8
Father Maloney's Boys' Haven Vern Rickert 502-458-1171		22
Maryhurst School Melissa Dant 502-245-1576		63
Home of the Innocents Larry Owens 502-596-1209		28
LaRue County Schools	44	
The Life Connection Camille Turner 270-358-4111		44
Madison County Schools	5	
Presbyterian Child Welfare Sean Quinlan 859-623-9717		5

KY 2004-05 Local Neglected Institutions		
District and Institution	District Caseload	Facility Caseload
McCracken County Schools	22	
Community Youth Services Sarah Hall 270-251-2661		12
New Pathways Tracey Wyatt 270-674-6061		10
Meade County Schools	2	
Community Youth Services Mary Lynne Healey 270-351-6852		2
Oldham County Schools	6	
Home of the Innocents Host House Larry Owens 502-596-1209		6
Perry County Schools	57	
Buckhorn Children's Center Promod Bishnoi 606-398-7000		57
Pulaski County Schools	12	
Mt. View Group Home Chad Bivens 606-679-6251		8
Shoreline Group Home Sandra Coner 606-679-4782 Ex 226		4
Russell County Schools	6	
Jamestown Group Home Sandra Coner 606-679-4782 Ex 226		6
Scott County Schools	5	
Hollon House		5
TOTALS	733	733

This chart shows the name of the district, the name of the local institutions for neglected children and the contact name (with phone number). It also shows the number of children listed on the October count. The children are a part of the formula children used by the US Department of Education to calculate the Title I, Part A allocation. The amount of funds generated by children in local neglected institutions becomes a part of the Title I, Part A allocation. Funds must be set aside at the district level to provide comparable services to children in the local neglected institution. It is not necessary to set aside the total amount generated. All children in the local neglected institution may benefit from the funds set aside for services, not just the children on the October count. Funds may also be set aside to provide services to children local institutions for delinquent children and neglected or delinquent children in community day school programs.

PRESCHOOL AND TITLE I

NCLB, Title I, Part A, Sections 1112 and 1115

PRESCHOOL AND TITLE I

NCLB, Title I, Part A, Sections 1112 and 1115

Preschool can play a major role in providing high-quality early learning experiences to young children. Supporting children's growth, development, and learning in the early years, particularly for children who face significant challenges to successful learning, is an important strategy for preventing school failure. Research has found that intensive, high-quality preschool programs can close much of the early achievement gap for lower-income children (Barnett, 1998). Title I recognizes the value of early intervention through proven approaches.

Funding Preschool Programs

A district may reserve funds (set-aside) to operate Title I preschool programs. Those funds may be distributed to other comparable public early childhood education programs (such as Head Start, Even Start, Early Reading First) to operate Title I preschool programs. Public schools receiving Title I funds may use the school's allocation to operate a Title I preschool program.

A district or school is **not** required to serve preschool students. Preschool students cannot be included in calculating the allocations to schools. The district may reserve funds in the district set-asides to serve eligible preschool students in the district as a whole or for a portion of the district; or a participating school may use its Title I funds to serve eligible preschool students. The requirements for a targeted assistance school and a schoolwide program apply to services for preschool students.

Kentucky's preschool education programs are available for all four-year-old children who are eligible for free lunch; all three and four-year-old children with developmental delays and disabilities, regardless of income; and other four-year-old children as placements are available. Title I preschool programs cannot replace those services. Title I preschool programs must supplement the Kentucky preschool programs.

Standards for Preschool Programs

A district that uses Title I funds to provide preschool programs to low-income children must ensure that those services comply at a minimum with the achievement standards established under section 641A(a) of the Head Start Act. The specific Head Start standards applicable to Title I preschool programs are in regulations at 45 CFR 1304.21-Education and Early Childhood at: <http://www.headstartinfo.org/pdf/1304.pdf>.

A Title I preschool program using an Even Start model must integrate early childhood education, adult literacy or adult basic education, and parenting education into a unified family literacy program. Also, the Title I preschool programs using an Even Start model must include program elements (1) through (15) in section 1235 of Title I, Part B. The legislation for the Even Start Family Literacy Program is at: <http://www.ed.gov/programs/evenstartformula/index.html>.

The *Kentucky Early Childhood Standards* document was designed to reflect the range of developmental abilities typical of young children, birth through four years of age. Although the Kentucky Department of Education does not require public preschools to design their programs around these standards, districts will want to reference the information as preschool programs are being developed. The *Kentucky Early Childhood Standards* are at: <http://www.education.ky.gov/KDE/Instructional+Resources/Preschool/default.htm>.

Eligible Students

When a Title I preschool is funded at the district level criteria must be established to identify the children who are most at risk of failing to meet Kentucky's student academic achievement standards. The district must include multiple, educationally related, objective criteria.

A preschool that is part of a Title I school operating a **schoolwide** program is not required to identify particular children as eligible to participate in the Title I preschool. Rather, all children in the attendance area of the school are eligible for preschool services.

To be eligible to attend a Title I preschool program in a **targeted assistance** school, preschool-age children must be failing or most at risk of failing to meet Kentucky's student academic achievement standards as determined by multiple, educationally related, objective criteria established by the district and supplemented by the school.

Children who participated in a Head Start, Even Start, Early Reading First, or Title I preschool program at any time during the two preceding years, homeless children, and children in institutions for neglected or delinquent children are automatically eligible for Title I preschool and to continue into Title I school programs.

Qualifications for Teachers and Paraeducators

Beginning in Fall 2004, **only** certified or exempted teachers may be hired as lead teachers in state-funded and Title I funded preschool programs. Districts must hire teachers with the IECE certificate (or IECE Probationary), an IECE statement of eligibility, or a letter of exemption. Districts must pay all certified teachers on the certified scale. Classified preschool teachers who were lead teachers prior to Fall 2004 may stay in their positions as classified teachers, but they may not be hired by another district. Information on teacher certification is available from the Kentucky Education Professional Standards Board at: <http://www.kyepsb.net/>.

Preschool paraeducators whose duties include instructional support and who work in a program supported with Title I, Part A funds must meet **one** of the following NCLB requirements –

- Completed two years of study at an institution of higher education; **or**
- Obtained an associates (or higher) degree; **or**
- Met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing reading, writing, and mathematics (or as appropriate reading readiness, writing readiness, and mathematics readiness).

Parental Involvement

Parent involvement in the education of children should begin as soon as they start school. Early childhood, preschool, and kindergarten programs that train parents to work with their children at home tend to have significant, positive effects. All provisions of parent involvement that are required for schoolwide and targeted assistance programs are also requirements of a Title I funded preschool except the discussion of school-parent compacts at parent-teacher conferences in elementary schools.

PARENT INVOLVEMENT

NCLB, Title I, Part A, Section 1118

PARENT INVOLVEMENT

NCLB, Title I, Part A, Section 1118

Research shows when schools work together with families to support learning, children are inclined to succeed not just in school but also throughout life. Participation of parents and families is critical throughout a child's entire academic career. This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Parent Involvement* that may be found at <http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.

Funding Parent Involvement Activities

Any district with an allocation of more than \$500,000 must set aside 1% of their allocation to carry out the required parent involvement activities. At least 95% of the funds set aside for parent involvement activities must be distributed to the schools. Districts with an allocation of \$500,000 or less are still required to implement the parent involvement requirements. Parents must be involved in the decisions as to how the parent involvement funds are allocated for parent involvement activities.

Districts providing Title I services to private schools must reserve funds for parent involvement activities for parents of participating private school children. The district must reserve parent involvement funds before allocating funds to Title I public schools. The funds must be proportionate to the number of eligible private school children. For example, if the percent of eligible private school children is 5% of the total low-income students in the district, the percent of parent involvement funds to be reserved from the districts parent involvement funds for the private school is 5%.

Building Capacity for Involvement

In order to ensure effective parent involvement for building capacity the district must:

- Assist parents in understanding Kentucky's assessment and their child's performance.
- Provide training and materials to help parents work with their children to improve their achievement (i.e. literacy and technology training).
- Train staff with the assistance of parents on how to reach out to, communicate and work with parents as equal partners in their children's education.
- Implement and coordinate parent programs.
- Inform parents about school activities and meetings in a language they can understand.
- Coordinate and integrate parent involvement programs with Head Start, Reading First, Early Reading First, Even Start, the Home Instruction Program for Preschool Youngsters, the Parent as Teachers Program, and public preschool to support parents in helping in their children's education.

The district may:

- Involve parents in the development of training for staff to improve the effectiveness of the training.
- Provide transportation and childcare to enable parents to participate in school related meetings and trainings.
- Offer meetings at a variety of times and conduct in-home conferences to encourage parent involvement.

- Adopt and implement model approaches to improve parent involvement and provide support for parent involvement as requested by parents.
- Establish a districtwide parent advisory council and involve community organizations and businesses in parent involvement activities.
- Train parents to help promote the involvement of other parents.
- Provide literacy training, if no other funds are available for training.

Resources to Improve Parent Involvement

Contact ED's Information Resource Center for information on ED programs, resources, and events at 1-800-USA-LEARN. Specific activities and resources include:

- **Education News Parents Can Use**, a television series about ways to ensure children's educational success. The third Tuesday of each month during the school year, **Education News** provides parents with the tools and information they need to be effectively involved in their children's learning. [For information on how to register visit the following URL and go to FAQs: <http://www.ed.gov/news/av/video/edtv/index.html>.]
- **EDPubs**, the Department's Publication Center has a multitude of free materials and resources that can assist SEAs, LEAs, schools, parents, communities, and organizations in encouraging and maximizing parental involvement. [EDPubs can be reached directly by calling 1-877-4ED-PUBS (433-7827). Order documents on-line at edpubs@inet.ed.gov.]
- **The Achiever**, a biweekly electronic newsletter that provides information, events and announcements about *No Child Left Behind*. For other newsletters and journals from ED visit: <http://www.ed.gov/news/newsletters/index.html>
- The **No Child Left Behind website** at: <http://www.nochildleftbehind.gov/>
- The "**What Works Clearinghouse**" (WWC), a project to help education decision-makers answer such questions as *how do we create better schools and how can we make sure that all children can read?* A part of the Department's Institute of Education Sciences, the WWC has been established to put solid evidence from high-quality scientific research into the hands of educators, policy-makers and the public so they may make better choices about programs and practices. To receive e-mail updates, subscribe to *WWCUpdate* on the Web at www.w-w-c.org. or call 1-866-WWC-9799.
- **National Center for Family and Community Connections with Schools**, funded through the Southwest Regional Educational Laboratory (SEDL) by the Department's Institute of Education Sciences, bridges research and practice to remove barriers to student achievement. The Center links people with research-based information and resources that they can use to effectively connect schools, families, and communities. The Center reviews emerging findings and research to develop an online database, annual conferences and annual reports to help advance procedural knowledge and provides training and networking across the regional educational laboratory system to link research findings to practice. [For more information visit <http://www.sedl.org/connections/about.html>.]

District Level Requirements

Annual Evaluation

An annual evaluation of the effectiveness of the district's Parent Involvement Policy and parent involvement activities must be conducted. The evaluation should determine whether:

- The academic quality of the school has improved.
- Parent participation has increased.
- Barriers exist that hinder greater participation by parents.

The evaluation may be conducted through a written survey, a telephone survey or in person. Districts must document and summarize the evaluation findings and how the information will be used to improve the parent involvement program.

District Parent Involvement Policy

A written parent involvement policy at the district level must be jointly developed, agreed upon, and distributed to parents of participating children. The district's current Parent Involvement Policy should be revised to determine that it meets the Title I parent Involvement policy requirements. The district policy must be reviewed by parents and revised as needed on an annual basis. Documentation of the review must be on file in the Title I coordinator's office.

A written district parent involvement policy must establish expectations for parent involvement and describe how the district will:

1. Involve parents in the joint development of the Comprehensive District Improvement Plan and in the process of school review and improvement.
2. Provide the coordination, technical assistance and other support necessary to assist participating Title I schools in planning and implementing effective parent involvement to improve student academic achievement and school performance.
3. Build the schools' and parents' capacity for more effective parent involvement.
4. Coordinate and integrate parent involvement strategies with Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters.
5. Conduct an annual evaluation of the content and effectiveness of the Parent Involvement Policy in improving the academic quality of the schools including identifying barriers to greater participation of parents, in particular: low-socioeconomic, limited English proficiency, limited literacy, or minority parents.
6. Use the evaluation findings to improve the parent involvement program and revise the Parent Involvement Policy as needed.

School Level Requirements

Annual Evaluation

An annual evaluation of the effectiveness of the school's Parent Involvement Policy and parent involvement activities must be conducted. The evaluation should determine whether:

- The academic quality of the school has improved.
- Parent participation has increased.
- Barriers exist that hinder greater participation by parents.

The evaluation should indicate whether the school is a targeted assistance school or a schoolwide program. The evaluation may be conducted through a written survey, a telephone

survey or in person. Districts must document and summarize the evaluation findings and how the information will be used to improve the parent involvement program.

School Parent Involvement Policy

Each Title I school must jointly develop, agree upon and distribute to parents of participating Title I children a written parental involvement policy. This policy must:

- Be reviewed by the school to determine that it meets parent involvement requirements.
- Be reviewed by parents and revised as needed on an annual basis with documentation of the review on file in the Title I coordinator's office and in the school.

A school's written policy must describe specifically how the school will:

1. Hold an annual meeting to inform parents of their school's participation in Title I, to explain Title I requirements and the parent's right to be involved.
2. Offer a flexible number of meetings (transportation, child care, or home visits may be provided if needed) to encourage parent involvement.
3. Involve parents in the planning, review and improvement of the parent involvement programs.
4. Provide parents of participating Title I children:
 - Timely information about Title I programs.
 - School performance reports; including school curriculum, core content and student performance standards.
 - Student's assessment results.
 - Description and explanation of the curriculum used at the school and the types of academic assessment used to measure student progress.
 - Additional opportunities for parents to offer suggestions and to participate in decisions relating to the education of their children.

School-Parent Compacts

All Title I participating schools must develop a school-parent compact jointly with parents of Title I participating students that:

1. Describes the school's responsibility to provide high quality curriculum and enables Title I children to meet Kentucky's academic achievement standards.
2. Describes how parents will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, television watching, volunteering in their child's classroom, participating in decisions relating to their child's education and positive use of extracurricular time.
3. Addresses the importance of establishing ongoing, good communication between teachers and parents through:
 - Annual parent-teacher conferences to discuss individual student progress discussing the child's achievement.
 - Frequent progress reports to families on student academic progress.
 - Reasonable access to staff and opportunities to volunteer, observe and participate in classroom activities.

District Title I Parent Involvement Checklist

These questions may assist a school district in knowing if parent involvement requirements have been met at the district level. This is not a required form and is not sent to the State Title I office. *For a district parent involvement program to be in compliance, each question must be answered with a "YES."*

1. Was the district Parent Involvement Policy developed jointly and agreed upon by the parents of participating Title I students through meaningful consultation?
2. Has this Parent Involvement Policy been distributed to parents?
3. Does the Parent Involvement Policy describe how the district will:
 - Establish the expectations for parent involvement?
 - Involve parents in the joint development of the Title I program?
 - Involve parents in the school review and improvement plan?
 - Provide the coordination, technical assistance and other necessary support to participating schools in their planning and implementing of effective parent involvement?
 - Build the capabilities of schools and parents to ensure strong parent involvement?
 - Coordinate and integrate Title I Parent Involvement strategies with those of Head Start, Even Start, Reading First Program, Early Reading First, Parents as Teachers Programs, Home Instruction Programs for Preschool Youngsters?
 - Annually evaluate the policy as to its effectiveness in increasing parent participation, and identifying barriers to parent participation (e.g. low-income, disabilities, literacy, English proficiency or other racial or ethnic consideration)?
 - Use the findings of the annual evaluation to design strategies for school improvement or to update the district policy?
4. Is the district policy recorded in the board meeting minutes?
5. If the district has an allocation of \$500,000 or more, does the district expend at least one percent of its allocation for parent involvement purposes? Is at least 95% of that one percent distributed to the Title I schools? If the district receives less than \$500,000, does the district expend funds for parent involvement?
6. Are the parents of participating Title I students involved in deciding the ways in which the parent involvement funds are used?
7. Does the Parent Involvement Policy ensure effective parent involvement and support a partnership among schools, parents and the community by:
 - Assisting parents in understanding Kentucky's assessment and their child's performance?
 - Providing training and materials to parents to help their children's achievement (i.e. literacy and technology training)?
 - Training staff in how to reach out to, communicate and work with parents as equal partners in their children's education?
 - Informing parents about school activities and meetings in a language they can understand?
 - Involving parents in the development of training for staff to improve the effectiveness of the training? Enabling parents to participate in school-related meetings, trainings and parent involvement activities by providing transportation and child care if needed?
 - Offering meetings at a variety of times and locations to encourage parent involvement?

- Adopting and implementing model approaches to improve parent involvement and provide support for involvement as requested by parents?
 - Establishing a districtwide parent advisory council and involve community organizations and businesses in parent involvement activities?
8. Does the district provide full opportunity for the participation of parents with limited English proficiency or with disabilities?
 9. Does the district have documentation to substantiate the above? Such documentation could include agendas from parent meetings or trainings and comments from parents. Does the district have on file a copy of each school's Parent Involvement Policy?

School Title I Parent Involvement Checklist

These questions may assist a district and school in knowing if parent involvement requirements have been met at the school level. *For a school parent involvement program to be in compliance, each question must be answered with a "YES."*

1. Was the school Parent Involvement Policy developed jointly and agreed upon by the parents of participating Title I students through meaningful consultation?
2. Has the Parent Involvement Policy been distributed to parents?
3. Does the Parent Involvement Policy describe implementation of:
 - An annual meeting held at a convenient time to inform parents of school's participating in Title I and what this means for them?
 - A flexible number of meetings where transportation, childcare or home visits are provided as needed?
 - The involvement of parents in an organized, ongoing and timely way to assist in planning, reviewing and improving, the Parent Involvement Policy and the school parent involvement program?
 - Findings from the annual evaluation and their utilization in revising the Parent Involvement Policy?
4. Does the Parent Involvement Policy provide timely information concerning
 - The Title I program?
 - School performance profiles that show the school's progress toward meeting the learning goals/academic expectations?
 - The individual student assessment results and interpretation of those results?
 - A description of the school curriculum?
 - An opportunity for parent input to allow for suggestions and participation in decisions relating to the education of their children?
5. Was the School-Parent Compact developed with the parents of the participating Title I children?
6. Does the compact describe how parents, the entire school staff and students will share the responsibility for improving student achievement?
7. Does the compact describe how the school and parents will build and develop a partnership to achieve Kentucky's high standards?
8. Does the compact provide:
 - A description of the school's responsibility to provide a high-quality curriculum and instruction in a supportive and effective learning environment that enables students to meet Kentucky's performance standards?
 - A description of the ways in which parents will be responsible for supporting their children's learning, such as monitoring attendance; homework completion and television watching; volunteering in the classroom and participating in decisions related to their child's education?
 - A description of the importance of ongoing communication between parents and teachers by at least one annual parent-teacher conference where the compact is discussed as it relates to the child's achievements; frequent reports on the child's progress and reasonable access by the parent to the school staff?
9. Does the Parent Involvement Policy ensure effective parent involvement and support partnerships among schools and the community by:

- Providing materials and training to parents?
 - Using the assistance of parents to educate teachers, pupil service personnel, principals and other staff in the value and utility of contributions from parents and how to reach out and work with parents as equal partners in implementing and coordinating parent involvement and building ties between home and school?
 - Coordinating and integrating Title I parent involvement strategies with those of Head Start, Even Start, Early Reading First, Reading First, Parents as Teachers Program, and Home Instruction Program for Preschool Youngsters and public preschools?
 - Providing activities and opportunities such as parent resource centers, training in child development and other areas to help the parents become a full partner in their child's education?
 - Ensuring that information related to school and parent programs, meetings and other activities are sent to the parents in the language used at home?
10. Does the school provide full opportunity for the participation of parents with limited English proficiency or with disabilities?
11. Does the school have documentation to substantiate the above answers? Such documentation could include agendas from parent meetings or trainings and comments from parents?

Sample Annual Parent Involvement Evaluation

Please customize the evaluation with district letterhead. Personalize the evaluation to contain names of teachers, instructional assistants, classes, etc. and to reflect the program at your school. This evaluation is only a sample and should be revised to address a schoolwide program or a targeted assistance school. This sample has combined issues for both programs.

Dear Parents:

Your child has been a participant in the schoolwide program or targeted assistance school with a focus on (reading/math/social studies/science) during this school year. (Personalize with child's name, type of program and focus area of TAS to fit your school.)

The purpose of this questionnaire is to gather information on how well the school communicates with parents of children who receive Title I services (change this if the school is a SWP). Please take a few minutes to complete this questionnaire. Your feedback will be used to improve parent involvement activities. Suggestions on how we can better help our students at home or at school are welcome.

Please answer Yes or No and return to (name of school or teacher) with your child. Thanks for your valuable input.

1. (For TAS) Were you notified when your child was chosen for Title I services? (For SWP) Were you notified that your school is a schoolwide program?
2. Did you receive a copy of the school Parent Involvement Policy?
3. Did you talk about the School-Parent Compact with the teacher
4. Were you invited to a meeting to talk about the SWP or TAS program (including discussions about curriculum, assessment and expected performance levels)?
5. Have you been invited to a parent-teacher conference this year?
6. Were you offered information or suggestions as to how to help and support your child's learning (e.g. monitoring attendance, TV, homework completion, etc.)?
7. Have you been asked how the school could improve the parent involvement program?
8. Were you asked to help design the school's Parent Involvement Policy?
9. Did you receive student progress reports in a timely manner?
10. Is the information provided to you understandable?
11. Has the school staff been supportive and willing to help?
12. Has the instructional program been a positive experience for your child?
13. Has the school provided a variety of learning opportunities for your child?

Please check the items that apply.

14. Which would be the best source(s) for you to receive information about your school?

Newspaper	School newsletter	Your child	Title I teacher
Principal	Classroom teacher	Other parents	Other (Explain)

15. What help could you use that would allow you to attend parent-teacher conferences, parent meetings, and training sessions?

Child care	Transportation	Time of meeting	Disability accessibility
Someone to read materials		Interpreter (List language)	

Sample Annual Parent Involvement Evaluation

Here is another sample of an evaluation. Remember to personalize the survey. Add an introduction explaining the purpose of the survey. Ask questions so that you receive information that will assist you in improving parent involvement.

Please answer Yes or No to the following:

1. I have been invited to attend training to help my child succeed in school.
2. I am aware of when the school council holds its meetings.
3. I received a copy of the school-parent compact.
4. I was invited to attend the meeting to work on/revise the school-parent compact.
5. I am aware of Kentucky's standards and goals for the school and how the staff is working on achieving these goals.
6. I have the opportunity to give input into the school policies.
7. I was notified of the meeting to evaluate the school's Parent Involvement Policy.
8. My child has benefited from the help of Mr./MS. _____.
9. My child felt comfortable about attending this school.
10. Meetings were held at a convenient time of the day.
11. Working in the science lab has helped improve my child's understanding of science.
12. Materials sent home were easy to follow and easy to understand.
13. I was kept well informed of the activities at the school.
14. I felt comfortable and welcome in the school.
15. I felt comfortable volunteering at the school.
16. I received clear information regarding my child's academic progress.
17. Opportunity has been provided for parents to communicate with principals and other administrative staff.

If you answered "No" to any of these, please offer suggestions to help us in that area. Please offer any comments that you feel will strengthen the parent involvement program at the school. Thanks for your time and participation.

PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS

NCLB, Title I, Part A, Sections 1120 and 9501

PARTICIPATION BY PRIVATE SCHOOL CHILDREN AND TEACHERS

NCLB, Title I, Part A, Sections 1120 and 9501

This technical assistance document is intended to provide an overview of the authorizing statute and should be used in conjunction with the U.S. Department of Education policy guidance *Title I Services to Eligible Private School Children* that may be found at <http://www.ed.gov/policy/elsec/guid/edpicks.jhtml?src=ln>.

Overview

The *No Child Left Behind Act* (NCLB) requires a district to annually offer equitable participation in Title I, Part A services to each private school that has children from participating Title I, Part A attendance areas. The district must offer this participation through timely and meaningful consultation with each private school. The private school may be located within or outside the district. Home schools are treated as private schools for Title I, Part A purposes. Title I, Part A provides services to eligible private school children, **not** funds to private schools.

In NCLB, equitable participation is measured by the amount of funds spent on children, teachers and families. This means that a low-income private school child living in a participating Title I, Part A attendance area must generate the same per pupil allocation as the low-income public school child living in the same participating Title I, Part A attendance area. To be eligible to receive Title I, Part A services, a child must reside within the attendance area of a participating public school location in a low-income area and be failing or at risk of failing student academic achievement standards. Certain other children may be identified as eligible solely by their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading First, or a Migrant Education program. The allocation for each low-income child in the private school is combined. From these combined funds, the service to all of the Title I eligible children is provided. Children with the greatest need must be served first. A similar allocation process is used to determine the equitability of professional development and parent involvement services for the teachers and families of participating private school children.

Definition of Equitable Services

If the following occur, services by the district to private school children are deemed equitable.

- The district assesses the specific needs of the eligible private school children and rank orders the students so that the child with the greatest need is served first;
- The district meets the equal expenditure requirements;
- The district provides the private school children with the opportunity to participate that is equitable to the opportunity provided to public school children; and,
- The services are designed to meet the educational needs of the private school children and supplements the educational services provided by the private school and provides reasonable promise for the private school children to achieve at high levels as called for in the state's child academic standards;
- The district annually assesses the progress of the Title I, Part A program toward enabling private school children to meet the standards agreed upon through consultation with the private school.

If the following occur, services by the LEA to teachers and families of private school children are deemed equitable.

- The district ensures that, from the district set aside funds for parent involvement and professional development, the teachers and families of participating private school children have equal access to participate;
- The district ensures the amount of funds available to the private school teachers and families is proportionate based on the number of low-income children residing in the participating Title I, Part A attendance areas; and
- The district, after consultation with the officials of the private school, conducts professional development and parent involvement activities for the teachers and families of the participating private school children either in conjunction with public school activities or independently.

Step By Step Process for Providing Services To Private School Children

The following are detailed steps that take the Title I, Part A district staff through the process of a timely and meaningful consultation with private school officials and the provision of equitable services to eligible private school children.

1. The district Title I, Part A coordinator should determine a method for obtaining written documentation of the district's offer of equitable services to private school children and the private school's response to this offer. Title I, Part A services should be explained at the time of notification. (See the Sample Letter of Notification to Private Schools.) The documentation of the attempt(s) to notify the private school and of their reply should be kept in the district office files. Records will be reviewed at the time of a Title I, Part A program review. Here are examples of how a district may notify private schools:
 - If the district chooses to mail certified (or confirmation of receipt) letters to private schools with the "declaration of participation" for Titles II, IV and V, the letter needs to explain the difference between Title I, Part A and the other programs. When a child from the district's attendance area attends a private school in another district, Titles II, IV and V funds do not follow that child. Title I, Part A services must be offered to each private school that has children from participating attendance areas, regardless of whether the private school is located within or outside the district. The letter should also explain that Title I, Part A provides services to identified private school children, not funds to the private school.
 - It is not necessary to send notification about Title I, Part A services to private schools by registered mail. Instead, a district may send personally addressed, dated, first class letters to each private school. If the school does not reply to the letter in a reasonable length of time, note the lack of response on the letter and initial it. Remember that each private school with children from participating attendance areas must be notified, regardless of whether the private school is located within or outside the district. Home schools are considered private schools for Title I, Part A purposes.
 - Parents may read and sign-off on information regarding all services available when the parent notifies the district of the intent to home school.
 - The district Title I, Part A staff may meet individually with private school officials and have them sign and date a form stating that the private school was notified.
2. Upon receiving a response from a private school indicating interest in participating in the Title I, Part A program, the process of timely and meaningful consultation regarding the design and development of equitable services begins. To meet the consultation requirements of NCLB, there must be ongoing discussions, meetings and the exchange of

information between the district staff and the private school representatives these conversations must address the following areas:

- Design and development of the district's program in areas that may affect the opportunity of the private school children to participate in the programs and during the design, development and implementation of the services to the private school children;
- How the needs of the eligible private school children will be identified;
- Services to be offered to eligible children;
- Mechanisms for the delivery of the services that would include the how, when, where and by whom the services would be delivered; (Particular attention must be paid to the use of third party providers. If the district and the private school officials are in disagreement as to the use of a third party provider, the district must provide to the private school officials a written explanation as to why it will not use the third party provider.)
- Methods by which the Title I, Part A academic services will be assessed and how the district will use the results of the assessment to improve these services;
- Size and scope of the equitable services to be provided to the eligible private school children;
- Methods or sources of data the district will use to determine the number of eligible low-income families and whether the district will extrapolate data if a survey is used;
- Equitable services the district will provide to the teachers and families of participating Title I, Part A children from the district set asides in parent involvement and professional development.

The district must maintain in its records and provide to the state a written affirmation, signed by the appropriate private school staff that the required consultation occurred. (If the private school does not submit a signed document in a reasonable time, the district must submit to the state documentation that the consultation did occur.)

3. A district must allocate Title I, Part A funds to a participating public school attendance area basis on the number of children from low-income families. To provide equitable services to eligible private school children, the district reserves the amounts generated by low-income private school children who reside in participating attendance areas. These amounts generated must be based on the same per pupil amount. A district may use poverty from the same source for both public and private school children (such as free and reduced-price meal data). If that data is not available, a district may use different poverty data for private school children as long as the income level for both sources is generally the same. Other sources of poverty data such as a survey of parents, Temporary Assistance of Needy Families (TANF/AFDC) or tuition scholarship may be used. The district, in consultation with private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. The public school district must keep documentation of poverty data on file.
4. In consultation with private school officials, a district must establish criteria to determine the areas of greatest academic need of eligible children and then establish the criteria for identifying the children with greatest need. The needs assessment of the private school is essential in the identification of the Title I, Part A area(s) of focus.

The following must happen for a private school to identify Title I, Part A areas of service.

- The school must conduct a needs assessment to determine the Title I, Part A focus area(s). Analyze normed-reference test scores, student work and other academic data to determine the focus area(s) of Title I, Part A services.

- The school must identify and rank eligible children once the focus area(s) of Title I, Part A service(s) has been determined. (See Samples 1 and 2 of Ranking of Students For Services in a Private School.) The eligibility of these children is based upon the following:
 - Only children residing in participating Title I, Part A public school attendance areas may receive Title I, Part A services;
 - Children who are failing or most at risk of failing to meet state academic standards and having greatest academic need for special assistance are to be served by Title I, Part A;
 - This identification is to be based on multiple, educationally related, objective criteria established by the public school district;
 - An eligible child must not be older than 21;
 - Economically disadvantaged, disabled, migrant and limited English proficient children are eligible on the same basis as other children;
 - A child who at any time within the two years preceding the identification year participated in Head Start, Even Start, or Early Reading First is eligible; and
 - A child who is homeless is eligible.
 - A sample child eligibility list included in this document. Put all of the names of children in the categories under “Eligible Children” on the list.
 - Rate only the eligible children in the focus area identified by the needs assessment. Sample ranking sheets are attached for reading and math. Different skills may be substituted for those in the sample. Also, if social studies or science is determined to be the focus area, a ranking sheet may be developed for the particular content area or combined with reading.
 - Developmental checklists or other screening instruments may be substituted for the ranking sheets in order to more effectively assess the needs of Kindergarten-Grade 3 children.
 - The children who are in greatest academic need of assistance are provided Title I, Part A services.
 - The public school district Title I coordinator should keep this data on file.
5. Through the consultation process, the district must design a supplemental program to meet the needs of the identified children with the amount of funds generated by the private school. These services must be equitable in comparison to services and other benefits provided to public school participants and must employ methods and instructional strategies for improving academic achievement that have been shown to be effective through scientifically based research. Title I, Part A personnel are not prohibited from providing instructional services in religiously affiliated schools. Personnel can go on private school property but cannot provide “in-class” services. Title I, Part A paid staff must be the employees of the district. This employment may take place through a contract for service. All teachers and paraeducators must meet the definition of highly qualified. Paraeducators must work under the direct supervision of the public school employed teacher. This does not permit a Title I, Part A funded program to be operated entirely by paraeducators. The title and control of property, equipment and supplies, must remain with the district. Delivery options in providing services to participating private school children include, but are not limited to:
- Instruction and services provided at the private school site (free of religious symbols), in a pull-out setting by either public school employees or third party providers;
 - Educational radio and television;
 - Computer-assisted instruction (in a pull-out setting);

- Extended-day services;
- Home tutoring;
- Take-home computers.

Simply providing instructional materials and supplies is **not** an option available to the district. It does not meet the equitability requirement.

If the funds allocated for private school children are not sufficient to provide instructional services, the district in consultation with the private school may provide services such as counseling staff development, and parent involvement if it is appropriate to assist the identified children to reach high academic achievement standards. The district must assess the effectiveness of these services on the academic achievement of the participating students.

6. It is important that Title I, Part A teachers and district officials consult with private school officials and instructional staff in order to coordinate Title I, Part A services. It is generally preferable to schedule this consultation during non-instructional times. The consultation may occur:
 - At a public or private school site;
 - A neutral site;
 - By telephone;
 - With the use of a simple form to be completed by the classroom teacher and the Title I, Part A teacher reporting the child's individual needs and skills being taught.
7. The district may reserve costs in the district set-asides to cover the administrative cost of operating the services to private school children. Cost for the third party contractor's administration and the cost for furniture must come out of the districts Title I, Part A administrative funds.
8. The parent involvement program funded by Title I, Part A must meet the needs of the parents of private school participants. After consultation with the private school staff and parents, the district conducts an annual meeting with the parents, initiates written compacts between the district and parents outlining their shared responsibilities and provides workshops for parents on how to work at home with their children on reading and math.
9. The equitable professional development activities provided to the private school teachers of Title I children must be designed to meet their specific needs and increase their skills and knowledge regarding providing instruction to Title I children. If reasonable and necessary, stipends may be provided during training directly to the private school teacher. Substitutes may **not** be provided.
10. The district must annually assess the progress of the Title I, Part A program toward enabling participating private school children to meet the standards agreed upon by the district and the private school. Since it is not appropriate to use the state test to assess the progress of private school children, the district must use reasonable alternative standards. Every year as part of the consultation process, the district and the private school must decide on what constitutes annual progress for the Title I, Part A program and how the program can most effectively be assessed.
11. Notification of Title I, Part A services must occur annually.

**Sample
Letter of Notification to Private Schools**

Letter Head of District

Date:

Name and address of private school:

Dear (name of private school official if known):

This letter is our annual invitation for your school to participate in the (**district**) Title I, Part A program. Title I, Part A is a federally funded program that provides supplemental instructional services to eligible children who are attending public, private, or home schools. To be eligible to receive Title I, Part A services, a child must reside within the attendance area of a participating public school and be failing or at risk of failing student academic achievement standards. Children participating in the Title I, Part A program must be identified through a multiple criteria assessment as having an educational attainment that is below the level appropriate for their age. Certain other children may be identified as eligible solely by their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading First, or a Migrant Education program.

The amount of the funds available to provide this service in each public, private or home school is determined by the number of low-income children living in the participating Title I, Part A attendance area. For Title I, Part A purposes, low-income is defined as being eligible but not necessarily participating in the federally funded free or reduced lunch program. For private and home schools, the funds generated are available to provide instructional services to eligible student, their parents and teachers. The Title I law does not allow these funds or the equipment purchased with the funds to go directly to the private school or home school.

To ensure the Title I, Part A services are successfully meeting the educational needs of children, the Title I law requires that each participating child have a pre and post-test.

To facilitate Title I, Part A services to private and home schools, I would greatly appreciate your completing this short survey and returning it to me by (**date**). I have enclosed a stamped and self-addressed envelop for your convenience. If you have questions that you would like answered about the Title I, Part A program before you complete the survey, please call me at (**phone number**).

Sincerely,

Title I Coordinator

Name of private or home school: _____

_____ The school **would** like to participate in the Title I program during the (**school year**).

_____ The school **does not want** to participate in the Title I program during the (**school year**).

Name and Signature _____

Position _____

Address _____

Phone Number _____

Sample Private School Students Eligibility List for Title I, Part A Services

Name of School _____ Title I Focus Area _____

Directions:

- List the names of all children **(from participating Title I, Part A public attendance areas)** who are failing or most at risk of failing to meet state standards in the focus area of Title I services. Economically disadvantaged, disabled, migrant and limited English proficient children are eligible on the same basis as other children.
- Remember also to include those children **(from participating Title I, Part A public attendance areas)** who are classified as: Homeless, received Head Start, Even Start, or Early Reading First services within the last two years.
- A ranking sheet for the focus area is then used to determine those children with the greatest need for assistance that will be served by Title I, Part A.

NAME	GRADE	NAME	GRADE

Sample 1 – Ranking of Eligible Private School Students for Title I, Part A Services

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: READING

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

* Other objective criteria such as diagnostic tests may be added.

Sample 2 – Ranking of Eligible Private School Students for Title I, Part A Services

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Mathematics**

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

* Other objective criteria such as diagnostic tests may be added.

SCIENTIFICALLY BASED RESEARCH STRATEGIES

NCLB, Title I, Part A and Title IX, Section 9101

WHAT ARE SCIENTIFICALLY BASED RESEARCH STRATEGIES?

NCLB. Title I, Part A and Title IX, Section 9101

Overview

Educational research is the formal, systematic application of the scientific method to the study of educational problems. Stated another way, educational research is a careful and diligent search for an answer. Not all research is the same, nor is all research scientifically based. This document includes information to help schools and districts determine if strategies and programs are based on scientifically based research. This is a condensed version of information provided by the National Clearinghouse for Comprehensive School Reform (NCCSR) and the American Institute for Research (AIR). NCCSR developed a process to analyze research studies and has very detailed information on the web. Schools are encouraged to review the information on the NCCSR web site at: www.goodschools.gwu.edu. Schools can send questions about the research basis of reform strategies being considered to: AskNCCSR@goodschools.gwu.edu. NCCSR will find the available research on particular strategies and make some comments about the quality of the research. Schools are also encouraged to review information from AIR. The AIR developed a process for interpreting the research findings and judging the strength of the evidence for a particular instructional practice or reform model. The web site for AIR is: www.air-dc.org. Much of the information included in this document comes from these resources.

NCLB Definition

The definition for scientifically based research found in Title IX, Section 9101 of the No Child Left Behind Act (NCLB) states that the term scientifically based research means research that:

- Involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs
- Employs systematic, empirical methods that draw on observation or experiment; involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn
- Relies on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators
- Is evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random-assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls; ensures that experimental studies are presented in sufficient detail and clarity to allow for replication or, at a minimum, offer the opportunity to build systematically on their findings
- Has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous, objective, and scientific review

Components of Research Studies

The purpose of research is to understand a particular problem or the impact of an intervention. Interventions include the implementation of a program and/or practice. Each research study contains six specific components.

1. **Abstract** – 100-500 word summary of the study

2. **Objective** – describes what the researchers are trying to discover and includes the formal statement of the research question or hypothesis to be empirically investigated
3. **Research Procedures/Methodology** – identifies the research subjects; how data were measured and collected; and the methods of analysis used to reach the conclusions presented
4. **Findings** – provides the raw data and the analysis of the data
5. **Discussion Section** – provides the interpretation of the research findings
6. **Conclusion** – focuses on addressing the research question, hypothesis, or problem statement and asks if the study met the stated purpose

Analyzing Components of Research Studies

How researchers put components together is what determines the quality of a study and will determine how schools should read and examine research. It is important to recognize that different parts of a study will be relevant or applicable to varying degrees depending upon the questions the school has and where it is in the process of comprehensive school improvement.

1.) **Abstract**

The abstract is the first component a school should look at to determine the relevance of the study for the school. If the study is on a “math program” but the school’s need is reading, one would know immediately that this study is not appropriate for the school. If the research design is not very rigorous, it may give an indication as to whether the study will really help to determine the quality of a program or practice for the school.

2.) **Objective (Problem/Purpose)**

This component of the research study helps the school determine what the study is about and describes what the researchers are trying to discover. It includes a research question or hypothesis and the purpose of the study. There are three different reasons to conduct a study:

- To test a theory
- To assess the implementation or replicability of a reform practice or program
- To test the impact or effectiveness of an intervention practice or program

3.) **Research Procedures/Methodology**

This component of the research study will help the school assess the quality or rigor of the study. The methodology should clearly identify the composition of the research (subject sample), the research design (how data were measured and collected), and the methods of analysis used to reach the conclusions presented.

When a school looks at the research *subjects*, the school should analyze the appropriateness of the subjects to determine if they are the best possible group to study to answer the research question. Also, the school should examine the number of subjects involved as the composition and the number of subjects will affect the quality and applicability of the study.

The research procedure also describes the research *design* and how the particular design is best suited to test the problem statement. The link between the research question and the method must be clearly indicated and justified by the researcher. No matter what method of analysis is used, the researchers must provide justification for using a particular method. Research designs fall into two major categories:

- Quantitative – the collection of numerical data in order to describe, explain, predict, and/or control a phenomenon of interest. The data analysis is mainly statistical and relies predominantly on a deductive approach. Quantitative research begins with a theory about a relationship that suggests certain data to collect. The data are collected and analyzed. Findings will either refute or support the theory. There are three types of quantitative research that serve a particular purpose and are employed based on what a researcher wants to know:
 - Descriptive studies - report the way things are; are used to summarize, organize, and simplify data
 - Experimental studies - test hypotheses by observing conditions or characteristics to show that changes in one are caused by changes in the other, controls all conditions, measures the change or difference that occurs as a result of manipulating an intervention or variable, and must include a pre-test and a post-test to measure these differences
 - Quasi-experimental - a form of experimental research where the researcher cannot control at least one of the three elements of the design (environment, assignment to experimental and control groups, intervention)
- Qualitative – the research is actually multi-method in focus and involves an interpretive, naturalistic approach to its subject matter. Researchers study things in their natural settings, attempting to make sense of, or interpret, phenomena in terms of meanings people bring to them. Qualitative inquiry often starts out with “how” or “what” questions and tries to make sense of and describe what is going on. Qualitative research collects observations and is descriptive. There are three types of qualitative research:
 - Historical - the systematic collection and evaluation of data related to past occurrences in order to describe the causes, effects, and trends of events that may help to explain present circumstances or anticipate future events
 - Ethnographic - the collection of extensive narrative data over an extended period of time in a natural setting
 - Case studies - an in-depth examination of one particular entity or case over time

4.) Findings

This component will provide the raw data and the analysis of the data. The results will indicate whether the research is “statistically significant,” meaning the researchers found that the program or practice has made a difference and it was not by chance. It is important to look for findings that are statistically significant, that tells the school the treatment had an effect.

5.) Discussion Section

This component provides the interpretation of the research findings. The researcher identifies what can and cannot be concluded from the research and addresses the possible implications of the results. Researchers also connect the various aspects of their analysis, showing commonalities across groups, uniqueness where it exists, and inconsistencies in the results. Researchers should provide an honest appraisal of their work. They should also identify the limits of their findings, drawing attention to what is missing due to design or data analysis. Researchers should connect their work to the larger research world by highlighting what is and is not consistent with prior research.

6.) Conclusion

This component should provide much of the information the school needs to glean from research. It may be easier to review this section for most of the information the school needs about the study. Ultimately, what the school should look for in this section is whether the

program or practice under investigation improved student achievement and, if it did, what conditions are necessary to reproduce those results. The conclusion should explain not only the study findings, but also the implications of the findings.

Judging the Quality of a Research Based Study

Schools may find all types of research useful in making decisions. However, in planning for Comprehensive School Reform, Title I, Part A or Title V, Part A funding, NCLB specifies that the research must demonstrate adequate proof of success and must come from *quantitative research studies* using an *experimental or quasi-experimental design*.

To assist schools in analyzing research, NCCSR has established two levels (gold and silver) of standards for determining if a research study is scientifically based. Research of all kinds can help inform the school's work, whether or not it is seeking federal and state funds. Not all studies will meet the criteria established in NCLB (the gold or silver standards) for funding purposes. However, the school could use these studies to help decide which programs are most appropriate for the culture and climate of the school and implement them through other funding sources.

Gold Standard Research

- Experimental research
- The intervention (program/practice) studied and the outcome is clearly established (causality between treatment and student achievement/the practice works)
- Must control **all** conditions (environment, random assignment of subjects and intervention)

Silver Standard Research

- Quasi-experimental research
- Cannot determine causality
- Controls **all but one** of the conditions (environment, random assignment of subjects and intervention)

Evidence of Effects

Determining the gold or silver standard of a research study meets one of the six criteria in the NCLB definition of scientifically based research (uses an experimental or quasi-experimental design). The school needs to judge the strength of the evidence for an instructional practice or reform model using all six criteria. Also, to be scientifically based, at least four gold and/or silver standard research studies for one instructional strategy or reform model should be reviewed. Schools should refer to the *Determining Scientifically Based Status* chart to assist in determining scientifically based research status.

Following is information regarding five of the six criteria outlined in NCLB. Since the criterion regarding experimental or quasi-experimental design has been discussed extensively in this document, it is not listed below.

- Employs systematic and empirical methods – to meet this criteria, researchers must establish a clear and justifiable link between the research question and the method employed to answer it
- Uses rigorous data analyses – to meet this criteria, the data must be adequately analyzed so the conclusions can be justified and usually includes statistical analysis of student achievement data and statistically significant findings
- Relies on measurements that provide reliable and valid data – to meet this criteria, the data is considered **reliable** if a measure yields consistent results when taken under

similar conditions and **valid** if a measure accurately predicts what it is designed to predict

- Provides detailed results that allow for replication – to meet this criteria, there must be a clear, detailed description of the method and have enough information to allow a different researcher to conduct the same study
- Results have been subjected to scrutiny – to meet this criteria, the study must have been reviewed by independent experts or accepted in a peer reviewed journal

JUDGING THE QUALITY OF A SCIENTIFICALLY BASED RESEARCH STUDY

DETERMINING SCIENTIFICALLY BASED STATUS

This flow chart demonstrates the process for determining the scientifically based status of an instructional practice or reform model. At least four high or reasonable quality research studies should be used in making these decisions. Note: If any box in the chart with a (*) is answered “no”, the research study should **not** be considered scientifically based.

Yes to all

Yes to all but one

Yes

No

Yes

Yes

Yes

Yes

Yes

SCHOOLWIDE PROGRAM

NCLB, Title I, Part A, Section 1114

SCHOOLWIDE PROGRAM REPORT
Comprehensive School Improvement Planning
NCLB, Title I, Part A, Section 1114

School:

School Year:

Name of Schoolwide Program Planning Committee Chairperson:

In the spaces below, briefly describe how the schoolwide program (SWP) assures that the ten required components are being covered. While all ten may not be written into the Comprehensive School Improvement Plan's Action Components, they must be part of the schoolwide program. Title I does not have to fund all of the 10 components (other sources may fund some of the components) because federal, state and local resources are integrated in a schoolwide program. Federal funds must be supplemental to State and local funds, however services do not have to be supplemental to the regular education programs.

1. **Needs assessment covers whole school.** What data sources did the school use to plan the schoolwide program? What needs did the data identify? What specific grade levels and/or content areas were identified as a priority? What achievement gaps were identified?

2. **Schoolwide reform strategies.** What strategies, based on scientific research, will **all** teachers and paraeducators use? What is the program design and how is it correlated with the Program of Study and the core content? How does the program increase the amount and quality of learning time? How will the achievement gap be eliminated between various groups of students, including male and female students, students with and without disabilities, students with and without English proficiency, minority and non-minority students, and students who are eligible for free and reduced lunch and those who are not eligible? How will the special needs of low-achieving students be met?

3. **Instruction by highly qualified teachers.** Are all teachers certified in fields in which they are teaching? If not, what steps are being taken to ensure that **all** teachers will be highly qualified by the end of the 2005-06 school year? What is the educational background of paraeducators? What steps are being taken to ensure that **all** paraeducators will meet the educational requirements by January of 2006?

4. **Professional development.** What professional development (PD) is planned? How was the school's PD needs determined? How is the PD tied to the school's Comprehensive School Improvement Plan? How will the planned PD improve instruction? What makes the PD offerings high quality and ongoing? How are principals, teachers, paraeducators and other appropriate personnel such as: health services coordinators; special education coordinators; and directors of Family Resource and Youth Service Centers included in the PD? How will the impact of the PD on student achievement be measured?

5. **Strategies to attract highly qualified teachers.** What strategies are used to recruit highly qualified teachers? What strategies are used to retain highly qualified teachers in the school?
6. **Parent involvement.** What will the school do to increase parental participation, such as offering family literacy services? How are parents included in their child's education? How are parents involved in the development of the school's parent involvement policy, evaluation of the parent involvement program and the learning compacts?
7. **Assists transition.** What will the school do to emotionally and academically ease student transition from early childhood programs to elementary school programs?
8. **Measures to include teachers in decisions.** How are all teachers included in the selection of academic assessments? How do all teachers participate in the analysis of data and the development of the overall instructional program in order to improve student achievement?
9. **Activities to ensure that students meet state standards.** How does the school provide effective, timely, and additional intervention to students in danger of not meeting state standards? How are students and their needs identified for assistance? How do teachers and paraeducators collaborate for planning and instruction?
10. **Coordination and integration of programs.** What Federal, State and local funds are made available to the school? How does the school coordinate and integrate Federal, State and local programs and services to improve instruction and increase student achievement?

Components of a Schoolwide Program

NCLB, Title I, Part A, Section 1114

A schoolwide program includes all students enrolled in the school. The Federal funds must be supplemental to state and local education funds, however services do not have to be supplemental to the regular education programs. The following ten components must be included in a schoolwide program.

1. A comprehensive needs assessment of the entire school (including taking into account the needs of migratory children) that is based on information that includes the achievement of children in relation to the State academic content standards and the State student academic achievement standards.
2. Schoolwide reform strategies that
 - a. Provide opportunities for all children to meet the State's proficient and advanced levels of student academic achievement.
 - b. Use effective methods and instructional strategies that are based on scientific research that
 - Strengthen the core academic program in the school;
 - Increase the amount and quality of learning time, such as providing an extended school year and before- and after-school and summer programs and opportunities, and help provide an enriched and accelerated curriculum;
 - Include strategies for meeting the educational needs of historically underserved populations.
 - c. Include strategies to address the needs of all children in the school, but particularly the needs of low-achieving children and those at risk of not meeting the State student academic achievement standards who are members of the target population of any program that is included in the schoolwide program, which may include
 - Counseling, pupil services, and mentoring services;
 - College and career awareness and preparation, such as college and career guidance, personal finance education, and innovative teaching methods, which may include applied learning and team-teaching strategies;
 - The integration of vocational and technical education programs;
 - How the school will determine if such needs have been met.
 - d. Are consistent with, and are designed to implement, the State and local improvement plans, if any.
3. Instruction by highly qualified teachers.
4. High-quality and ongoing professional development for teachers, principals, and paraprofessionals (paraeducators) and, if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet the State's student academic achievement standards.
5. Strategies to attract high quality highly qualified teachers to high-need schools.
6. Strategies to increase parental involvement, such as family literary services.

7. Plans for assisting preschool children in the transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or a State-run preschool program, to local elementary school programs.
8. Measures to include teachers in the decisions regarding the use of academic assessments in order to provide information on, and to improve, the achievement of individual students and the overall instructional program.
9. Activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards required by the state shall be provided with effective, timely additional assistance which shall include measures to ensure that students' difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.
10. Coordination and integration of Federal, State, and local services and programs, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

What Research Findings Indicate About Effective Schoolwide Programs

The following concepts for effective schoolwide programs are based on educational research.

- All children's performances are negatively affected in schools with high concentrations of poverty.
- For the lowest achieving students in the highest poverty schools to meet high standards of performance, the school's entire instructional program, not just a separate Title I program, must be substantially improved.
- Educators in highly successful schools expect high academic achievement from every child.
- When an entire school is the target of change, schools serving disadvantaged youth can achieve success.

Common Characteristics of Effective Schoolwide Programs

Schoolwide programs must include the ten required components. An effective schoolwide program brings **all** federal, state and local resources together to improve the instructional program in order to impact student achievement. All federal, state and local resources address the ten components of a schoolwide program. Even though schoolwide programs vary from one school to another, effective schoolwide programs have the following characteristics.

Agreed-Upon Vision

All staff

- Share a common vision for all students.
- Make decisions based on a comprehensive needs assessment.
- Integrate the schoolwide plan in the Comprehensive School Improvement Plan.
- Coordinate resources from all Federal, State and local programs.

Academic Focus

All staff

- Focus on early childhood intervention.
- Use systematic, scientifically research based academic models that are matched to the needs of the students.
- Devise appropriate modifications and differentiate instruction to accommodate students' strengths and weaknesses.
- Integrates disciplines and specializations in thematic units, promoting reading and mathematics learning through explorations, writing, and problem solving around content themes.
- Use computers and other technology as instructional tools.
- Emphasize building student self-concept, cultural pride, and community identity.
- Use art, writing, reading and other integrated experiences for students to learn social studies and science through projects.
- Closely align professional development (PD) with school goals, needs assessment, and the Comprehensive School Improvement Plan.
- Visit other classrooms and discuss curriculum issues across grade levels/teams.

- Analyze student data to identify achievement gaps in subpopulations.

Management and Organizational Structure

All staff

- Are accountable for all students.
- Do not isolate Title I from the rest of the school.
- Intensify small group instruction within the classroom and assist classroom teachers to strengthen lessons.
- Are included in the planning and management phases.
- Manage programs by a committee that includes teachers, parents and administrators.

Project Design

All staff

- Deliberately design approaches emphasizing critical thinking skills.
- Design programs that include all disciplines in the academic program.

Parent Involvement

All staff

- Recruit and encourage parents to become partners in learning, actively engage parents in planning and learning and target school-parent programs to the needs of the community and families.
- Encourage parents to be more than volunteers; parents participate in planning, review, and evaluation of the program as well as school activities and organizations.
- Communicate with parents to maximize instructional time for students and foster a team effort.
- Follow a philosophy that school is a place where parents, as well as children, can learn and that entire families should use school facilities to meet their needs.
- Communicate information to parents through their native language.
- Provide examples of classroom events (video tapes, newsletters, open house, display of student work) for parents in order to broaden their understanding of the program.
- Provide transportation and childcare services for parents to participate in school activities.
- Develop partnerships with local businesses and community groups to foster successful schools.

Examples of Effective Program Design

The program design of a schoolwide program should reflect scientifically research based reform strategies that are directly aligned with the findings of the comprehensive needs assessment. The program design may vary to meet the different needs of grade levels and content areas in the school. All federal, state and local resources (staff, materials, labs, computers, professional development etc.) must be coordinated to improve student achievement. Title I should not be the only funding source for the schoolwide program. The following examples may be included in a school's program design.

1. Resource teachers to model effective instruction; provide on-going professional development; assist in strengthening lesson plans to reflect the core content and provide

guidance on curriculum alignment. The teachers could address needs such as writing, reading in the content area and integrating arts/humanities and practical living into the classroom.

2. Content specialist in a computer lab to collaborate with the classroom teacher on using a variety of strategies to answer open response items; developing writing prompts; using spread sheets and graphs; and finding computer programs that address higher level thinking skills. The content specialist could address identified needs such as writing, technical reading, reading comprehension and problem solving.
3. Science/math lab teacher to develop hands-on activities and experiments to enhance/expand instruction.
4. Extended kindergarten to provide early intervention that aligns with primary instruction.
5. Specific academic, research based models aligned with the school's needs assessment that provides early intervention strategies.
6. Total school restructuring efforts based on scientifically research based process models that are goal oriented and based on setting high expectations.
7. Software programs that coordinate with student performance standards and that expand higher-order thinking skills.
8. Parent coordinator to train teachers and parents, develop community partnerships and coordinate with family literacy programs and Family Resource & Youth Service Centers to help meet instructional needs of students.
9. Intersession programs for year round schools, summer school, expanded or extended day programs.
10. Classroom programs or scientifically research based models that improve students' academic achievement.

Using Other Federal Funds in a Schoolwide Program

The following are some examples of how funds from other federal programs may be utilized in a schoolwide program. The intent and purposes of the included programs must be met.

1. A secondary school may use funds received under the **Carl D. Perkins Vocational and Technology Education Act** to support its schoolwide program if its program improves vocational education in the school, for example by integrating academic and vocational education, and its program improves access to vocational education for special populations in the school.
2. A schoolwide program school may use funds received under **Title II, Part A, Teacher and Principal Training and Recruiting Fund** to provide the school with a sustained and intensive high-quality professional development program for school staff in core academic subjects that is aligned with Kentucky's content and performance standards, that reflects recent research on teaching and learning, and incorporates methods and practices to meet the educational needs of diverse student populations.
3. A schoolwide program school may use funds received under **Title IV, Part A of the Safe and Drug-Free Schools and Communities** program provided the school has a comprehensive drug and violence prevention program designed for all students and employees to create a disciplined environment conducive to learning, prevent violence and promote school safety, prevent the use, possession, and distribution of tobacco, alcohol, and illegal drugs by students, and prevent the illegal use, possession, and distribution of those substances by employees.

4. A school may use funds received under **Title III, Language Instruction for Limited English Proficient and Immigrant Students** to support its schoolwide program provided the program implements a bilingual education or special alternative instruction program that reforms, restructures, and upgrades the programs and operations that serve limited English proficient children and youth in the school.
5. A school may use funds received under **Title V, Part A, Innovative Programs** to support local education reform efforts that are consistent with Kentucky's education reform efforts, implement promising educational reform programs that are based on scientific research, meet the needs of at-risk youth, provide library and instructional and media materials and improve school, student, and teacher performance.

Research Findings

A research team for the Thomas B. Fordham Foundation studied forty schools with similar demographics. Thirty of the sites demonstrated rapid growth on standards based tests while ten showed little or no progress. Researchers found that, regardless of outside variables such as family income, a school could improve student learning when its faculty worked as a team, implemented core content instruction and was not shy about self-evaluation. Following are some highlights from their findings.

1. Schools whose scores did not increase added on new programs or materials that affected some teachers and not others and did not lead to a more unified schoolwide approach.
2. Schools whose scores did not increase were generally less focused on core content and more reluctant to eliminate activities that teachers enjoyed but were not clearly productive.
3. The improving schools made sure that teachers at every grade level were coordinating their efforts.
4. Improving schools took much more initiative to find and use professional development programs designed to remedy their particular instructional weaknesses and prioritized the use of their professional development time to support the school improvement plan.
5. Improving schools were much more likely than other schools to reach out to parents, explaining state tests and the need for improved performance and asking for help at home with reading and checking homework.

TARGETED ASSISTANCE SCHOOL

NCLB, Title I, Part A, Section 1115

TARGETED ASSISTANCE SCHOOL REPORT
Comprehensive School Improvement Planning
NCLB, Title I, Part A, Section 1114

School:

School Year:

Name of Targeted Assistance School (TAS) Planning Committee Chairperson:

In the spaces below, briefly describe how the targeted assistance program assures that the eight required components are being covered. While all eight may not be addressed in the Comprehensive School Improvement Plan's Action Components, they must be part of the targeted assistance program. Title I services and funds must be supplemental to the regular education program.

1. **Activities to ensure students meet state standards.** How are Title I resources used to provide effective, timely, and supplemental intervention to participating Title I students in danger of not reaching proficiency? How is the progress of students evaluated on an ongoing basis? How are the TAS services revised, based on on-going evaluations, to provide additional assistance to enable students to reach proficiency?
2. **School planning.** What data sources did the school use to develop the TAS services? What needs were identified based on the data? What focus/content areas are targeted for the Title I services, based on these identified needs? What grade levels did the data identify to be served by Title I? Who was involved in the planning of the TAS program? How are supplemental instructional services provided to participating Title I students? Are the Title I services of sufficient size and scope to provide quality supplemental instruction to participating students?
3. **Effective methods and instructional strategies.** What scientifically based strategies will Title I teachers and paraeducators be using? How will the achievement gap be eliminated between various groups of participating students, including male and female students, students with and without disabilities, students with and without English proficiency, minority and non-minority students, and students who are eligible for free and reduced lunch and those who are not eligible? How will the special needs of low-achieving Title I students be met? What extended opportunities are available for participating Title I students, i.e. extended school year, before school tutoring, after school tutoring, summer school? How are participating Title I students provided supplemental instruction to minimize removal from regular classrooms during regular school hours?

4. **Coordinate and support regular program.** What will the school do to emotionally and academically ease participating Title I students' transition from early childhood programs to elementary school programs? How do the Title I supplemental services coordinate with the regular education programs? How do Title I staff and regular education staff jointly plan, on a regular basis, to meet the academic needs of the identified Title I students.
5. **Instruction by highly qualified teachers.** Are Title I **teachers** certified in the fields/grade levels in which they are teaching? If not, what steps are being taken to ensure that the Title I teachers will be highly qualified by the end of the 2005-06 school year? What is the educational background of Title I **paraeducators**? What steps are being taken to ensure that Title I paraeducators will meet the educational requirements by January 2006?
6. **Professional development.** What professional development (PD) is planned to improve the instruction in the focus/content areas for Title I and other staff (those working directly with participating Title I students)? How were the PD needs determined and tied to the Comprehensive School Improvement Plan? What makes the PD that is offered high quality and ongoing? How will the impact of the PD on participating Title I student achievement be measured?
7. **Parent involvement.** What will the school do to increase involvement of participating Title I students' parents, such as offering family literacy services and using technology? How are parents of participating students included in appropriate PD? How are parents of participating Title I students involved in the development of the school's parent involvement policy, evaluation of the parent involvement program and the learning compacts? What PD will teachers and other staff receive on how to reach out to, communicate with and work with parents of participating Title I students to build ties between parents and the school? How do Title I staff collaborate with the Family Resource/Youth Service Center staff?
8. **Coordination and integration of programs.** How does the school coordinate and integrate Federal, State, and local program funds to improve instruction and increase student achievement for participating Title I children?

Targeted Assistance School Components

NCLB, Title I, Part A, Section 1115

A targeted assistance program must provide supplemental services for participating Title I children. The following eight components must be included in a targeted assistance program.

1. Use Title I resources to help participating children meet the State's challenging student academic achievement standards expected for all children.
2. Ensure that planning for students served is incorporated into existing school planning.
3. Use effective methods and instructional strategies that are based on scientifically based research that strengthens the core academic program of the school and that
 - Give primary consideration to providing extended learning time, such as an extended school year, before- and after-school, and summer programs and opportunities;
 - Help provide an accelerated, high-quality curriculum, including applied learning;
 - Minimize removing children from the regular classroom during regular school hours for instruction provided under Title I.
4. Coordinate with and support the regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First or State-run preschool programs to elementary school programs.
5. Provide instruction by highly qualified teachers.
6. Provide opportunities for professional development with Title I resources, and, to the extent practicable, from other sources, for teachers, principals, and paraprofessionals (paraeducators), including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in programs under Title I or in the regular education program.
7. Provide strategies to increase parental involvement, such as family literacy services.
8. Coordinate and integrate federal, state, and local services and programs, including programs supported under the No Child Left Behind Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

Collaboration in a Targeted Assistance School

NCLB, Title I, Part A Section 1115

Effective Approaches

In-class model: The Title I, Part A funded personnel collaboratively teaches with the regular classroom teacher in order to directly benefit children identified for Title I, Part A services. The focus of collaboration is continuous interaction between classroom and Title I, Part A funded staff to provide appropriate instructional opportunities for all students.

The regular classroom teacher helps all children develop skills, concepts and processes in a particular content area that will enable them to meet the academic expectations. The Title I, Part A funded teacher or paraeducators supports and reinforces the skills and strategies with identified students. The two staff members work together to ensure that identified students learn skills, strategies and concepts that will enable them to be successful.

Suggestions for effective collaboration include:

- Regular and on-going collaborative planning between the regular classroom teacher and the Title I, Part A funded staff
- Building an atmosphere of mutual trust between staff members
- Creating a shared vision of how the staff can work together
- Agree upon the mechanics of working together
- Planning lessons that utilize the talents of the staff
- Planning lessons that provide extra benefits to low-achieving students
- Cooperatively solving problems that arise
- Assessing and addressing the special needs of individual students
- Flexibility in delivering Title I, Part A services

Title I, Part A funded staff may collaboratively teach with regular classroom teachers as long as the effort directly benefits participating children. Targeted students must always receive instruction from the regular classroom teacher. Pullouts may not be routinely scheduled and may not be the only service provided. Title I, Part A services must supplement and support the regular educational program.

Limited Pull-out Programs: The *No Child Left Behind Act* requires instructional services to be provided by minimizing the removal of Title I, Part A participants from the regular classroom during the regular instructional day. It is Kentucky's position that pulling children from the regular classroom may be allowed only under limited circumstances. The following are the only allowable limited pullout strategies: (1) research-based instruction such as Reading Recovery that requires intensive one-on-one strategies in another setting and (2) elective classes for middle or high schools. Schools must determine the needs of their identified students and then implement the most effective instructional strategies to meet those needs.

A **limited** pullout program provides instructional services for participating children in a different setting and a different time than would be the case if those children were not participating in Title I, Part A. A limited pullout program meets the supplement, not supplant requirement if all of the following characteristics are met:

1. The project is particularly designed to meet participants' special educational needs.
2. The classroom teacher, who would be responsible for the provision of instructional services to participating children in the absence of Title I, Part A, remains responsible for, and continues to perform, those duties the teacher would be required to perform in the absence of Title I, Part A, including planning the instructional program of the participating children, providing them with instructional services, and evaluating their progress.
3. Paraeducators paid with Title I, Part A funds work closely with the regular classroom teacher, who is ultimately responsible for the provision of instructional services to participating children in the absence of Title I, Part A, so as to provide services that are particularly designed to meet participants' special educational needs.
4. Participating students pulled from the regular classroom are receiving additional services from the Title I, Part A staff. Title I, Part A cannot take the place of instruction that is provided by the regular classroom teacher. For example, a student receiving Title I, Part A services in reading cannot be pulled from the regular reading class to receive Title I, Part A services because Title I, Part A would then be taking the place of the regular classroom instruction. This is an example of supplanting.

Responsibility in Collaboration

School districts have the authority to strengthen, but not lessen, the Title I, Part A law by developing policies that further define the role of Title I, Part A staff in collaboration. For example, some districts have already established a policy that Title I, Part A staff jointly plan and provide services within the regular classroom setting 100% of the time.

School councils may not supersede Title I, Part A law. For example, the council may not establish a policy requiring Title I, Part A staff to provide only pullout services. The council may strengthen, but not lessen, the law and/or district policy. The school district is responsible for compliance of the Title I, Part A program.

Selecting Students for Title I Services in a Targeted Assistance School

NCLB, Title I, Part A, Section 1115

Title I Services: A Title I Targeted Assistance School (TAS) must use funds only to provide **supplemental services for children identified as in greatest academic need of assistance**. The goal of a targeted assistance school is to improve teaching and learning to enable Title I participants to meet the state's challenging academic standards that all children are expected to master.

Identification and Selection of Students: Each school conducting a targeted assistance program must identify the lowest-achieving children for participation in the Title I program.

1. **Needs Assessment** – A school must conduct a comprehensive needs assessment as a part of its Comprehensive School Improvement Plan to determine priority needs. Based on these priority needs, the Title I focus area(s) is determined.
2. **Eligible Population** – The eligible population for Title I services is
 - Children not older than age 21 who are entitled to a free public education through grade 12; and
 - Children who are not yet at a grade level at which the local educational agency provides a free public education.
3. **Eligible Children** – From the population described above, a targeted assistance school identifies children eligible for Title I services who are
 - Children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards;
 - Children from preschool through grade 2 selected solely on the basis of criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures;
 - Children who are economically disadvantaged, children with disabilities, migrant children or limited English proficient children, are eligible for Title I services on the same basis as other children selected to receive Title I services;
 - Children who, at any time in the 2 years preceding the year for which the determination is made, participated in a Head Start, Even Start, or Early Reading First program, or in preschool Title I services;
 - Children who, at any time in the 2 years preceding the year for which the determination is made, received services under the migrant program;
 - Children in a local institution for neglected or delinquent children and youth or attending a community day program for such children;
 - Children who are homeless and attending **any** school served by the local educational agency.
4. **Children Selected for Title I Services** – From the eligible children, a targeted assistance school selects children for Title I services on the basis of multiple, educationally related, objective criteria established by the district and supplemented by the school.
 - Classroom teachers rate only the eligible students in the focus area identified by the needs assessment. Sample ranking sheets are attached. Revise the ranking sheet for different ability levels and to fit the school's needs.
 - Developmental checklists or other screening instruments may be substituted for the ranking sheets in order to more effectively assess the needs of kindergarten-primary 3

(formerly grade 2) students. These checklists may include such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

- The children who are in greatest academic need of assistance are provided Title I services.
- Each school should keep this data on file. The district Title I coordinator should keep a copy of the school's student ranking data.

Note: Title I funds may **not** be used to provide services that are otherwise required by law to be made available to children in a targeted assistance school. Title I funds may be used to coordinate or supplement such services.

Student Eligibility List for Title I, Part A, Services in a Targeted Assistance School

Name of School _____ Title I Focus Content Area _____

Directions: List the names of all students who scored or are **performing** at a novice or apprentice **level** in the content area on which Title I services will focus. Economically disadvantaged, disabled, migrant and limited English proficient students are eligible on the same basis as other children. Remember also to include those students who are classified as homeless or who received Head Start, Early Reading First, or Even Start services within the last two years or is in a neglected or delinquent institution. A ranking sheet for the content area is then used to determine those students with the greatest need for assistance that will be served by Title I.

[illegible]

Sample 1 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: Reading

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

Other objective criteria such as diagnostic tests may be added.

Sample 2 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Mathematics**

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

* Other objective criteria such as diagnostic tests may be added.

Sample 3 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: Social Studies

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

* Other objective criteria such as diagnostic tests may be used.

Sample 3 – Ranking of Eligible Students in a Targeted Assistance School

SCHOOL _____ TEACHER _____ GRADE _____

INSTRUCTIONAL AREA: **Science**

Rank child in each column using the following rating scale:

1-very low 2-low 3-low average 4-average 5-above average

[illegible]

* Other objective criteria such as diagnostic tests may be used.

SCHOOL BASED DECISION MAKING AND TITLE I

NCLB, Title I, Part A, Sections 1001, 1113, 1114, 1115, 1116

SCHOOL BASED DECISION MAKING AND TITLE I

NCLB, Title I, Part A, Sections 1001, 1113, 1114, 1115, 1116

Introduction

Title I, Part A of the *Elementary and Secondary Education Act* (ESEA), as amended by the *No Child Left Behind Act* (NCLB), is designed to help disadvantaged children reach high academic standards. School councils and district administrators must work together to accomplish this purpose. The purpose can be accomplished by:

1. Closing the achievement gap between high and low performing students, especially the achievement gaps between minority and non-minority students and between disadvantaged and their more advantaged peers;
2. Holding schools, local educational agencies and states accountable for improving the academic achievement of all students;
3. Providing greater decision making authority and flexibility to schools and teachers in exchange for greater responsibility for student performance; and
4. Promoting schoolwide reform and ensuring the access of children to scientifically based instructional strategies and challenging academic content.

Ranking of Schools for Eligibility and Selection

The district must use Title I funds only in schools that have been selected for services through allowable procedures. The district ranks the schools based on the percent of low-income children residing in that particular attendance area or enrolled in that school. The district must serve schools above 75% low-income in rank order regardless of grade span. If additional funds remain, the district may then continue on with the ranking by the district as a whole or rank remaining schools by grade span groupings.

District Set-Asides

Before distributing funds to participating schools, the district may reserve funds at the district level. Because the reservation of funds by a district will reduce the funds available for distribution to participating schools, the district must consult with teachers, pupil service personnel, principals and parents of children in participating schools in deciding district set-asides. District set-asides must not be used to benefit one school over another by circumventing the per pupil amounts allocated to schools.

School Allocation

Each school that receives Title I services is to be notified of its Title I allocation. The Title I allocation for each participating school is based on the per pupil amount times the number of low-income students in the school. It is suggested that the district Title I coordinator attend a SBDM meeting to discuss the school allocation. The allocation is based on the total number of children from low-income families in the school. The schools in the district are rank ordered in terms of percent of low-income with the highest poverty school receiving services first. The fiscal control (finance and records) of the Title I program must be maintained at the district level. The district Title I coordinator must approve Invoices using Title I funds.

Role of District Program Administrators and the Role of the School Council

Title I services must be designed and implemented according to federal law. The school council may have considerable decision-making authority in the design and implementation of the

school's Title I program within the confines of the Title I law and regulations. The role of the district Title I coordinator is to consult with the schools on a continuing basis in regard to making decisions which ensure high standards for all children. The coordinator advises school councils on Title I laws and regulations. The coordinator and the school council must work closely in the administration of the school's Title I program. The district Title I coordinator has the responsibility to monitor all Title I programs to ensure compliance, as well as the implementation of highly effective programs. There are two types of programs under Title I, Part A that are operated at the school level:

1. **Schoolwide Program** – A local educational agency may consolidate and use Federal, State, and local funds to upgrade the entire educational program of a school in which at least 40 percent of the children are from low-income families. The schoolwide program must be developed in consultation with the district program administrators and with the involvement of parents, other members of the community, teachers, principals and other school staff. In a secondary school, students must be involved in planning the schoolwide program.
2. **Targeted Assistance School** – In a school receiving Title I funds that is ineligible for a schoolwide program or that chooses not to operate a schoolwide program, a local educational agency may use Title I funds only for programs that provide services to participating children identified as having the greatest academic need.

The *No Child Left Behind Act of 2001* (NCLB) requires a comprehensive needs assessment to be conducted by each school based on the performance of children in relation to Kentucky's standards. The design of the Title I program must be based on the results of the needs assessment and effective research-based instructional practices. Both schoolwide programs and targeted assistance schools are included in the Comprehensive School Improvement Plan. District-level program coordinators are required to be a part of the team that reviews the Comprehensive School Improvement Plan for compliance and effectiveness. The plan is then subject to approval by the school council. While all of the components of a schoolwide program or a targeted assistance school may not be written into the Comprehensive School Improvement Plan, they must be a part of the program design. The school should complete the Comprehensive School Improvement Planning Report for schoolwide programs or the report for targeted assistance schools.

Title I Funded Personnel

Assignment of personnel to implement Title I services must be based on the results of the school's needs assessment. A schoolwide program and a targeted assistance school are required to provide instruction by highly qualified staff. The principal has the authority to reassign Title I personnel within the school as long as it is within the parameters of the Title I budget and the requirements of the Title I program. The council may not transfer or recommend transfers of the Title I staff to other schools. If a school is no longer served by Title I, the district is to reassign the personnel according to local district policies and state law.

ALLOCATION PROCEDURE FOR TITLE I, PART A

NCLB Title I, Part A, Sections 1124 – 1125A

ALLOCATION PROCEDURE FOR TITLE I, PART A

NCLB Title I, Part A, Sections 1124 – 1125A

The following information explains how allocations for Title I, Part A are calculated.

Formula Children

The U.S. Department of Education bases the Title I, Part A allocations on the number of formula children in each district. Formula children are defined as:

- Children ages 5-17 residing in the geographic boundaries of the school district **from families below the poverty level** identified from **census data** compiled by the U.S. Department of Commerce. Census poverty children comprise the greatest portion of formula children.
- Children ages 5-17 **in licensed facilities for foster children** updated **annually** by the Kentucky Cabinet for Families and Children and reported to the U.S. Secretary of Health and Human Services.
- Children ages 5-17 **in local institutions for neglected children** reported **annually** by the Kentucky Department of Education to the U.S. Department of Education.

At the district level, an increase or decrease in the number of formula children (relative to other districts across the country) affects individual district allocations.

Grants that Make Up the Title I Allocation

Districts that meet the requirements will receive 4 funding grants: Basic Grants, Concentration Grants, Targeted Grants and Education Finance Incentive Grants (EFIG). The US Department of Education calculates the allocations to the district level. The 4 grants make up the Title I, Part A allocation and are **not** accounted for separately.

1. **Basic Grants** – To be eligible, a district must have at least 10 formula children **and** the number must exceed 2% of its total 5-17 population.
2. **Concentration Grants** – To be eligible, a district must have more than 6,500 formula children **or** more than 15% formula children of its total 5-17 population.
3. **Targeted Grants** – To be eligible, a district must have at least 10 formula children (without weights) **and** the number must exceed 5% of its total 5-17 population.
4. **Education Finance Incentive Grants (EFIG)** – To be eligible, a district must have at least 10 formula children (without weights) **and** the number must exceed 5% of its total 5-17 population. Weights vary among states depending on each state's equity factor.

Hold-Harmless Percentages

All four grants provide for a variable hold-harmless guarantee for each district. The hold-harmless percentage depends on the formula child rate of each district. For Basic, Targeted and EFIG, a district must meet the eligibility criteria in order for hold-harmless protection to apply with one exception. For the Concentration Grant, the hold-harmless provision applies to a district for 4 years even if it no longer meets the eligibility criteria. There is no hold-harmless protection if a district is no longer eligible for the Basic Grant, Targeted Grant or EFIG. The hold-harmless percentage will help the district with the minimum amount. No district will receive:

- Less than 95 percent of its previous year's allocation if the number of formula children constitutes 30% or more of the district's ages 5-17 population;
- Less than 90 percent of its previous year's allocation if the number of formula children is between 15% - 30% of the district's ages 5-17 population;

- Less than 85 percent of its previous year's allocation the number of formula children is less than 15% of the district's ages 5-17 population.

A district that was last eligible for a Concentration Grant in SY2000-01 but not eligible in SY2001-02, SY2002-03, SY2003-04 and SY2004-05 will receive its hold-harmless amounts in SY2004-05. If that district fails to meet the Concentration Grant eligibility thresholds next year (SY2005-06), it will no longer be eligible for the hold-harmless guarantee.

If a state did not receive enough funds to hold each district at the appropriate hold-harmless percent, then all district allocations would be ratably reduced.

Role of State Education Agency

Before districts receive the Title I, Part A allocations, the Kentucky Department of Education must adjust each grant that makes up the Title I, Part A allocation:

- Reserve 1% for state administration.
- Reserve **4%** for school improvement; 95% of the 4% must be allocated to districts that have schools in need of improvement. (For 2001-02 and 2002-03, 2% was reserved.) When reserving funds for school improvement, the state must ensure that no district receives less in total under Title I, Part A than it received in the prior year.
- If needed, use the sliding scale hold-harmless percentages to adjust the total allocation. For districts that are no longer eligible for the Targeted Grant and the Education Finance Incentive Grant, the hold-harmless percentage is based on the previous year's Basic Grant only.

TRANSFERABILITY OF FEDERAL FUNDS

NCLB, Title VI Section 6123

TRANSFERABILITY OF FEDERAL FUNDS

NCLB, Title VI Section 6123

The No Child Left Behind Act (NCLB) increases the flexibility with which districts may use their federal funds. NCLB authorizes a district not identified for improvement under Title I to **transfer up to 50 percent** of each fiscal year's funds for applicable programs among certain federal programs.

A district identified for improvement under Title I may **only transfer up to 30 percent** of each fiscal year's funds for applicable programs. **All transferred funds must be used for district improvement activities.**

1. Among which programs may I transfer funds?

You may transfer funds **FROM** each of these programs:

- (1) Title II-A Teacher Quality (**MUNIS Revenue object 5231**)
- (2) Title II-D Education Technology (**MUNIS Revenue object 5234**)
- (3) Title IV-A Safe and Drug-Free Schools (**MUNIS Revenue Object 5232**)
- (4) Title V-A Innovative Programs (**MUNIS Revenue Object 5233**)

TO any of these programs:

- (1) Title I-A Basic (**MUNIS Revenue Object 5241**)
- (2) Title II-A Teacher Quality (**MUNIS Revenue Object 5242**)
- (3) Title II-D Education Technology (**MUNIS Revenue Object 5245**)
- (4) Title IV-A Safe and Drug-Free Schools and Communities (**MUNIS Object 5243**)
- (5) Title V-A Innovative Programs (**MUNIS Revenue Object 5244**)

Note: Districts may transfer funds into Title I but may not transfer funds from Title I.

2. Does the transferability limitation apply to the funds that a district receives under each of the programs to which the transferability authority applies or to the total amount of funds that a district receives under all of these programs?

The transferability limitation applies to the funds that the district receives under each of the separate programs listed in Question 1, not to the aggregate amount of funds that the district receives under all of the programs.

3. When may I transfer funds and how many transfers may I make?

You may submit multiple Transfer Amendments to KDE between June 1st and September 30th for *any* federal year allocation. **You can make no transfers after September 30th.**

4. My district has decided to transfer funds. What do I do now?

The district must notify KDE at least 30 days prior to the transfer. The finance officer originates a Transfer Amendment and forwards it to the superintendent or his/her designee for submission via email to the Kentucky Department of Education. Unless there is a problem with the Transfer Amendment, the amendment is approved upon receipt. You will be contacted if there is a problem.

To submit a Transfer Amendment via **email** to the Kentucky Department, of Education, the district must:

1. Set up a folder in email of the superintendent or designee for "Transfer Amendments" since only the superintendent or designee may submit Transfer Amendments to KDE.
2. Send the email to *Becky Stoddard* at bstoddar@kde.state.ky.us or select her name from the Global Exchange.
3. Copy the email to the district program coordinator as well as any other appropriate persons in the district.
4. In the Subject line of the email, type "*Transfer Amendment*".
5. In the Message box of the email, attach the Transfer Amendment.
6. Email the Transfer Amendment to the KDE contact (Becky Stoddard). The contact will forward the email amendment to the appropriate program staff at KDE for review.
7. Update the Comprehensive District Improvement Plan and the affected MUNIS program budgets to reflect the changes in the approved amendment. The following quarter's MUNIS expenditure report must reflect the changes.

5. How do I modify my comprehensive district improvement plan to show I am transferring dollars to another program?

Within 30 days of the submission of the transfer form, the district must provide KDE with a modified comprehensive district improvement plan. Modify the budget by increasing the program budget to which funds were transferred by an amount that corresponds to the decrease in the budget of the program from which funds were transferred. Since transferred funds are subject to the rules and requirements of the program to which they were transferred, you may also need to amend your plan to show any programmatic changes.

6. If I transfer funds, what program requirements will apply?

Transferred funds are subject to the rules and requirements applicable to the program to which they are transferred. Any requirements apply to the original allocation + (plus) the transferred amount.

7. How will I receive funds transferred to another program?

The original allocation for each program will not change. If funds are drawn by "federal cash request" you cannot request more than your original allocation for each program. Therefore, you will need to request the funds on the "federal cash request" by the original program.

8. What if I have a private school participating in the program I want to transfer?

In accordance with the General Provisions, Section 9501, consultation with private school officials is required if the transferred funds involve private school participation. If the private school does not agree to the transfer, the district must allocate the per pupil amount to the private school based on 100% of the original program allocation.

9. Whom do I call if I have questions?

You may call Becky Stoddard at 502-564-1979.

TITLE I, PART A FINANCIAL INFORMATION

NCLB Title I, Part A, Sections 1126 & 1127

TITLE I PART A GOVERNANCE

NCLB Title I, Part A

1. Public Laws (statutes) enacted by Congress:
 - a) ***No Child Left Behind Act of 2001 (NCLB – Public Law 107-110 - reauthorized*** the Elementary and Secondary Education Act of 1965 (ESEA) effective January 8, 2001.
 - b) ***General Education Provisions Act (GEPA) as amended by IASA of 1994*** contains requirements that apply to most programs administered by the US Department of Education.
 - c) ***Single Audit Act of 1984 - Single Audit Act Amendments of 1996*** - requires annual financial audits by an independent auditor for grantees and subgrantees expending more than \$300,000 per year in federal financial assistance and that audits be performed in accordance with government auditing standards for financial audits. If an entity does not meet the \$300,000 threshold, it may not charge the cost of a Single Audit to a federal award but could charge the cost of limited scope audits. The Single Audit Act Amendments of 1996 apply to audits of fiscal years beginning on or after July 1, 1996.
 - d) ***Cash Management Improvement Act (CMIA) of 1990*** - Public Law 104-453 - enacted to improve the transfer of funds between federal agencies and the states through the use of sound management principles.
2. Regulations Enacted By Federal Agencies (published in the Federal Register):
 - a) ***Education Department General Administrative Regulations (EDGAR)*** - US Department Of Education regulations that further define public law by identifying requirements implementing general mandates or administrative policies which have the full force and effect of law when based on underlying statutory authority. Title I Regulations in 34 CFR, Part 200 and Parts 76 (except 76.650-76.662), 77, 80, 81, 82 and 85 are applicable to the Title I program.
 - b) ***Treasury Department Regulations*** - US Department of Treasury regulations that identify standards to follow for controlling and accounting for federal funds and further define the Cash Management Improvement Act of 1990. Require federal agencies to monitor the cash management practices and techniques of its recipients and requires recipients (State Education Agency - SEA) to monitor the funds held by secondary recipients (Local Education Agency - LEA).
3. Government-wide Administrative requirements developed and issued by one of the central management agencies such as the Office of Management and Budget (OMB) and the Department of Treasury that apply to all federal departments/agencies. Designed to bring a degree of uniformity and consistency to federal grants management. These requirements do not carry the full force of the law by themselves, but federal agencies can make them applicable by incorporating them into their regulations or grant conditions.
 - a) ***Accounting Principles and Standards for Federal Agencies*** - General Accounting Office (GAO) headed by the Comptroller General of the U.S. - imposes various accounting requirements on federal agencies (i.e. US Department of Education and grants administered by those agencies).

- b) **Office of Management and Budget (OMB) Circulars/Cost Principles and Treasury Department Government-wide Circulars** - refine GAO's accounting requirements and set forth several cost and other administrative requirements for grantees and subgrantees. Many federal agencies adopt these requirements by incorporating them into their own regulations.
- c) The US Department of Education has incorporated the following OMB Circulars into EDGAR that are applicable to Title I:
 - **OMB Circular A-102 Revised** - "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments"
 - **OMB Circular A-87** - "Cost Principles for State, Local and Indian Tribal Governments"
 - **Revised OMB Circular A-133** - "Audits of States, Local Governments and Non-Profit Organizations"

SUMMARY OF TITLE I PART A FINANCIAL INFORMATION

NCLB Title I, Part A, Sections 1126

Title I, Part A Funds

1. For local educational agencies (LEAs) with Title I allocations of \$50,000 or more, Title I, Part A carryover funds on September 30 are limited to no more than 15%. An state educational agency (SEA) may grant a one-time waiver of the percentage limitation during a three-year period upon written request of an LEA if it determines the request is reasonable and necessary or if supplemental appropriations become available.
2. "Old" year funds must be expended/obligated prior to new" year funds. Remember that as long as expenditures are allowable, the Comprehensive District Improvement Plan Expenditure may show changes in object codes and transfers of monies among object codes and code series as long as the object code series are open. An amendment is needed only to open a new code series and to purchase equipment that costs \$5,000 or more per unit after the initial budget has been submitted and approved.
3. This will ensure LEAs are under the 15% limit on September 30 and that they have expended old year funds prior to the lapse date that is a year earlier than the new year grant. New year funds should not be requested on the federal cash request form until old year funds have been requested. Old year funds drawn down on the federal cash request form are to be disbursed within 30 days to be in compliance with the Cash Management Improvement Act. LEAs will be allowed one overlap request for the last remaining old year funds and the first draw down on new-year funds to meet their next payroll. A final expenditure report for the old year grant is to be submitted electronically before requesting a second draw on new year funds. Also, good business management practices dictate eliminating maintaining accounting records on two separate grants concurrently.
4. The Comprehensive District Improvement Plan Budget will be submitted electronically by September 30. District program coordinators work with the finance officer to determine program budgets by specific MUNIS codes. Refer to the Comprehensive District Improvement Plan Funding Matrix to verify allowable expenditures.
5. The finance officer enters the budget line by line into MUNIS. With this method, the budget is entered only once, and all specific object codes are open as long as the object code series is open.
6. The Division of Budgets will review the object code series, not specific object codes. She will also review the Title I portion of the Comprehensive District Improvement Plan Expenditure Report to verify allowable expenditures.
7. LEAs must allocate Title I funds to schools according to the identified formulas and LEAs must document that each school expended its allocation. School allocation expenditures are to be maintained at the local level.
8. LEAs with Title I allocations greater than \$500,000 are required to set-aside at least 1% of their allocation for parent involvement activities. At least 95% of the 1% parent involvement set-aside must be distributed to Title I schools for parent involvement. Documentation must be on file locally showing the amounts expended for Title I parent involvement activities.
9. Schools identified for Title I School Improvement must expend at least 10% of its Title I school allocation for each fiscal year that the schools is in school improvement status. Documentation is to be maintained at the local level.

Electronic Expenditure Report

10. Districts will submit a Comprehensive District Improvement Plan Expenditure Report electronically for the programs in the Comprehensive District Improvement Plan. The expenditure report is submitted for the quarter ending the previous month: July 1 - September 30 report period due October 25; October 1 - December 31 report period due January 25; January 1 - March 31 report period due April 25; and the April 1 - June 30 report period due July 25.
 - The Comprehensive District Improvement Plan Expenditure Report may show changes in object codes and transfers of monies among object codes as long as the object code series are open. Also, expenditures in specific object codes must be allowable according to program guidelines.
 - Use the Comprehensive District Improvement Plan Funding Matrix to verify allowable expenditures. Each program coordinator must review the report prior to submission to ensure expenditures in specific object codes are allowable according to program guidelines. Back-up documentation must be on file locally for all costs charged to the grant.

Federal Cash Request

11. Federal Cash Request forms for advanced funding are to be submitted by the 15th of each month to Sherry Brumback in the Division of Financial Management. Request only enough cash for the next 30 days disbursements. If cash requested plus previous cash received minus expenditures equals more than 1/9th of the grant, note on the form the reason the extra cash is needed.

Interest Earned

12. Interest earned over \$100 per year on US Department of Education federal grants must be returned to the federal government [(EDGAR) 34 CFR 80.21(i)]. Also, federal cash advances should be timed to meet immediate cash disbursements to eliminate cash balances on hand that would earn interest. LEAs consolidating bank accounts into one account with MUNIS tracking the expenditures by grant funds must distinguish between interest earned by US Department of Education grant funds and interest earned on other federal, state or local sources. Most commercial banks have the capacity to set up a system that separately tracks interest earned from funds deposited in the LEA's account from different sources.

Independent auditors conducting annual audits in accordance with the Single Audit Act of 1984 have been instructed to review interest earned on federal dollars. Any interest earned would have to be calculated only on federal dollars advanced and not on advances made from the General Fund to the federal program account. If it is determined interest was earned on US Department of Education federal grants, a check for interest earned over \$100 would be required to be submitted to the federal government.

Fiscal Requirements

13. To ensure that Title I Part A funds are used to provide services that are in addition to the regular services normally provided by an LEA for participating children, three fiscal requirements related to the expenditure of regular state and local funds must be met:
- **Maintenance of Effort** – Either the combined fiscal effort per student or the aggregate expenditures of the LEA from state and local funds for free public education for the preceding fiscal year cannot be less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. The underlying principle is that the district is responsible for maintaining effort from year to year in providing a free public education to its students; only then can Title I be added.
 - **Comparability** – State and local funds must be used to provide services in Title I schools that are at least comparable to the services provided in schools that are not receiving Title I funds. A LEA is considered to have met the comparability requirement if the LEA files with the SEA a written assurance that it has established and implemented a district wide salary schedule; a policy to ensure equivalence among schools in teachers, administrators, and other staff; and a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. The Comparability Report must be completed annually. The Comparability Report, Worksheets and backup data must be kept on file in the district Title I office.
 - **Supplement, Not Supplant** – An LEA may use Title I funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of children participating in Title I programs. **In other words, Title I cannot take the place of state and local resources.**

The two types of Title I programs are schoolwide programs and targeted assistance schools. Schoolwide programs (SWP) are designed to upgrade the effectiveness of the entire school program with the express purpose of helping all students to achieve, particularly the lowest performing students. In schoolwide programs, which may be conducted only in schools with very high poverty (40 percent or more), Title I funds are used with all other school resources and serve everyone in the school. Therefore, the fiscal test for determining whether Title I funds are supplemental in schoolwide programs is distinctly different than for targeted assistance schools. Because Title I services – the entire school program – are provided to all students in a schoolwide program, the supplement, not supplant test is **strictly a funds test**: Title I funds (and other federal education program funds included in the SWP) must supplement the total amount of funds that would, in the absence of the federal funds, be made available from nonfederal sources for the school, including funds needed to provide services required by law for children with disabilities and children with limited English proficiency.

In contrast, targeted assistance schools “target” additional services to only those students identified for Title I participation. For targeted assistance schools, the supplement, not supplant test is not only a funds test, but also a test of services. Participating students must be provided the same services with local and state funds that they would have been provided in the absence of Title I.

AVAILABILITY OF TITLE I. PART A FUNDS

NCLB Title I, Part A, Section 1127

Grant Period

Before a State Education Agency (SEA) may receive Title I Part A funds, it must submit a State Plan to the U.S. Department of Education for approval. Title I Part A funds become available for obligation by the SEA on July 1 for the federal fiscal year beginning October 1 and ending September 30.

A SEA may not authorize a Local Education Agency (LEA) to obligate funds until the later of the following: the date the SEA may begin to obligate funds; or July 1. **No funds may be obligated prior to July 1.**

Funds are intended to be expended during the year for which they were appropriated. However, in accordance with the Tydings Amendment of the General Education Provisions Act (GEPA), unexpended funds may be carried over an additional year except where restricted by specific statute.

15% Carryover Limitation

For LEAs with Title I basic allocations of \$50,000 or more, the Title I law limits the carryover as of September 30 (15 months) to not more than 15% of the LEA's Title I Basic allocation.

A SEA may, **once every three years**, waive the percentage limitation upon written request of an LEA if it determines that the request is reasonable and necessary or if supplemental appropriations become available.

Carryover Funds

Carryover funds are to be used in accordance with the federal statutes and regulations that are in effect for the carryover period. An LEA may **not** use carryover funds to provide services in an ineligible school. When allocating funds to school attendance areas, an LEA may:

1. Allow each school to retain its carryover funds for use in the subsequent year;
2. Take carryover funds back up from all the schools and distribute to participating schools in the subsequent year in accordance with allocation procedures; or
3. Designate carryover funds for particular activities that could best benefit from additional funding (examples: parental involvement activities, schools with the highest concentrations of poverty).

Expending Old Year Funds Prior to New Year Funds

While old year funds may be carried over, LEAs are reminded that old year funds must be expended prior to new-year funds. Old year funds have an earlier lapse date and good business management practices dictate that old year account be closed out rather than maintaining accounting records on two separate grants concurrently. Expending old year grant funds first will ensure the LEA is within the 15% limitation on September 30 carryover funds. A final expenditure report for the old year grant is to be filed before requesting a **second** draw on new-year funds.

Reallocation of Excess Funds

A SEA reallocates excess Federal program funds due to any one or a combination of the following:

1. An eligible LEA chooses not to participate in the Title I program;
2. An LEA has carryover funds in excess of the 15% allowed in Section 1127 of the law and a waiver cannot be granted;
3. An LEA's allocation has been reduced because it failed to meet the maintenance of effort requirements in Section 14501 of the statute;
4. The SEA has determined that an LEA has failed to spend funds in accordance with applicable laws and has recovered funds.

The SEA will reallocate excess funds to eligible LEAs providing evidence of the greatest need in accordance with established reallocation procedures. All LEAs will be notified in writing of the opportunity to apply for reallocation funds and provided the criteria for qualifying. Reallocation of excess funds will not extend the grant period for which the funds are available for obligation.

WHEN OBLIGATIONS ARE MADE

NCLB Title I, Part A (EDGAR 76.704-76.707)

Effective Date LEAs May Begin to Obligate Title I Funds

Title I grant funds cannot be obligated (see chart below) prior to the effective date of the grant identified in the Title I Plan approval letter or the effective date of an amendment. An effective date cannot be before the July 1 availability date of federal funds.

Obligation and Liquidation of Unpaid Obligations

For LEAs with Title I basic allocations of \$50,000 or more, the Title I law requires that funds be obligated by September 30 to comply with the 15% limitation for carryover funds. Obligations of carryover funds must be made **prior** to the lapse date of the grant.

Liquidation of unpaid obligations must occur within 90 days after the lapse date. Obligations are liquidated when a check has been issued for the obligated amount. **No deviations are allowed in obligations in effect at the end of a grant period.** For this reason, the Division of Program Resources recommends LEAs ensure funds are obligated **and** liquidated prior to the lapse date. Otherwise, any changes due to credits or backordered items will result in remaining funds having to be returned to the federal government. No new purchase orders or substitutions can occur.

When Obligations Are Made

An obligation is an actual cost owed due to purchase orders issued, contracts signed, or services rendered for which an LEA is **required** to make payment. It is not an anticipated or estimated cost. The following table shows when an LEA is considered to have an obligation for various kinds of property and services for which Title Funds will be disbursed:

If the obligation is for:	The obligation is made:
Acquisition of personal property	On the date the LEA makes a binding written commitment to acquire the property.
Personal services by an employee of the LEA	When the services are performed.
Personal services by a contractor who is not an employee of the LEA	On the date the LEA makes a binding written commitment to obtain the services.
Performance of work other than personal services	On the date the LEA makes a binding written commitment to obtain the work.
Public utility services	When the LEA receives the services.
Travel	When the travel is taken.
Rental of real or personal property	When the LEA uses the property.

BUDGETING INFORMATION

COMPREHENSIVE IMPROVEMENT PLAN EXPENDITURE REPORT

1. The Comprehensive Improvement Plan Expenditure Report provides data for all financial reporting requirements on a single report in printed form and in a spreadsheet import file format. The finance officer in each district received directions from the Division of School Finance on generating a Comprehensive Improvement Plan Expenditure Report.
2. The directions received by the finance officer also contain information on updating the projects for the new grant year. Funds from different grant years may not be commingled.
3. The expenditure report is submitted for the quarter ending the previous month: July 1 - September 30 report period due October 25; October 1 - December 31 report period due January 25; January 1 - March 31 report period due April 25; and the April 1 - June 30 report period due July 25.
4. A single report format as defined under the Comprehensive Improvement Report-Options has been predetermined and accepted by all Comprehensive Improvement grant programs. The information will be entered as individual object codes and then unit codes. The object codes will be totaled for those programs that don't need a breakdown by unit codes (schools).
5. The expenditure report may show changes in object codes and transfers of monies among object codes and code series as long as the object code series are open.
6. Expenditures in specific object codes must be allowable according to program guidelines. Use the Comprehensive District Improvement Plan Funding Matrix to verify allowable expenditures. Each district program coordinator must review the report prior to submission to ensure expenditures in specific object codes are allowable according to program guidelines.
7. An internal policy analyst in the Division of Budgets in the KY Department of Education will review the expenditure report to make sure that expenditures in specific object codes are allowable according to Title I guidelines.
8. The expenditure report will also be used to monitor LEA cash drawdowns on the Federal Cash Request form to ensure compliance with federal regulations limiting cash on hand and to monitor program expenditures in a timely fashion.

TITLE I BUDGET CALCULATIONS

1. Use whole dollar amounts.
2. **Salary Related Entries:** (Check with the finance officer since these figures change.)
 - a. Salaries are based on the board's adopted salary schedule.
 - b. Current employer's matching contributions:
 - Social Security (6.20%) – applies only to KERS and CERS employees
Salaries minus 5% Tax Deferred County Retirement x .0620
 - Medicare (1.45%) – applies to teachers hired after July 1, 1986
Salaries x .0145
 - Kentucky Teachers Retirement System (KTRS) (12.305%; July 1– increase to 13.105%)
Salaries x .12305
 - County Employees Retirement System (CERS) (6.34%)
Salaries x .0634
 - Kentucky Employees Retirement System (KERS) - (5. %)
Salaries x .05
 - Workers' Compensation (\$.33 per \$100) – Workers' Comp through Ky. School Bd. Association Insurance Trust may vary for each LEA depending on their Class, Tier and Experience Mod Factor
Salaries x .0033
 - Unemployment Insurance (1% of 1st \$6,000* if full-time Title I; prorate if salary is prorated.)
*If an employee makes less than \$6,000, use the lower figure
Example:

10 employees @ \$40,000:	$\$6,000 \times 10 \times .01 =$	\$600
3 employees @ \$40,000:	$\$6,000 \times 50\% \times 3 \times .01 =$	\$90
1 employee @ \$5,000:	$\$5,000 \times .01 =$	<u>\$50</u>
Total		<u>\$740</u>
3. **Indirect Costs (EDGAR 76.560-76.569):** Funds to defray indirect costs incurred by the board of education in the implementation of the Title I program may be paid by the Title I account to the General Fund.

On an annual basis, the Division of School Finance, Office of District Support Services, Kentucky Department of Education, assists LEAs in determining the indirect cost rates to be used in calculating the allowable amount of indirect costs claimed. Because of the supplement-not-supplant requirement of the Title I statute, the **restricted** indirect cost rate shall be used in claiming indirect costs against the Title I grant.

If a district claims indirect costs, only items that are specified in the indirect cost rate agreement (such as the Title I Coordinator's salary) may be charged to Title I. Indirect costs cannot be claimed on capital equipment purchases (\$5,000 or more per unit).

Indirect Costs Formula: Total Grant Amount - Capital Outlay Costs (Equipment \$5000 or more per unit) ÷ the sum of (the LEA's Restricted Indirect Cost Rate in decimal form plus 1.0) x LEA's Restricted Indirect Cost Rate = Total Indirect Costs Allowed (*Rounded*)

Example: \$251,405 Total Grant Amount - \$10,500 Equipment Costs = \$240,905
 $\$240,905 \div 1.0220$ (Sum of .0220 plus 1.0) = \$ 235,719.18
 $\$235,719.18 \times 2.20\%$ LEA's Restricted Indirect Cost Rate = \$5,186 Total Indirect Costs Allowed (rounded)

4. **Equipment:** Items having a useful life of more than one year and costing \$5,000 or more per unit are considered equipment and must have prior approval to purchase (EDGAR 80.30(b) and OMB Circular A-87). Equipment must be reasonable and necessary to meet the needs of Title I students. In targeted assistance schools Title I equipment may only be used by Title I students. Computers purchased with Title I funds may only be used to supplement the state required technology efforts. For equipment \$5,000 or more per unit, include an Equipment Exhibit in the text box of the amendment with the following: Equipment Item, Unit Cost, Number of Items, Total Cost, Location (name of school or office) and Justification for the Purchase. For accounting purposes use MUNIS object codes 0731-0736 for equipment regardless of cost. Use MUNIS object codes 0640/0645 for audio-visuals and 0640/0648 for computer software.
5. **Parent Involvement:** LEAs with district allocations greater than \$500,000 are required to set-aside at least 1% of their allocation for parent involvement activities. At least 95% of the parent involvement set-aside must be distributed to the Title I schools to use for parent involvement. LEAs on MUNIS can distinguish the various expenditure object codes used for these activities when keying budgets into the KETS DAS system by using the Parent Involvement ORG code number key 150. While Title I Comprehensive Improvement Plan Expenditure Reports will only reflect object codes, LEAs will have the capacity to document locally their expenditure of the 1% required. This information will be reviewed locally during monitoring visits and/or audits. Note: If a district only expends parent involvement funds for parent meetings/newsletters only, the object code 0892 would suffice.
6. **30% Sick Pay Retirement:** If the district has a written board policy whereby certified staff may receive 30% of their salary based on the unused sick days which is added to their last pay check, Title I may be charged for that salary **pro-rated to those days worked in the Title I program**. Payroll records are required to be on file in the local board office in support of the expenditure. This expenditure would be under object code 0291.

Estimated 30% Sick Pay Retirement

<u>Teacher</u>	<u>Total Years District Service</u>	<u>Total Years of Title I Service</u>	<u>% Title I Service</u>
Joe Jones	30	3	3 divided by 30 = 10%
Daily Rate of Pay:		\$142	
Number of Days Accumulated:		40	
\$142 x 40 sick days =		\$ 5,680	
30% of \$5,680 =		\$1,704	
Portion of Benefit Paid by District = .90 x 1,704 =		\$1,534	
Portion of Benefit Paid by Title I = .10 x \$1,704 =		\$170	

7. **Excess Costs of Operation and Maintenance of Plant:** Funds to defray excess costs of operating and maintaining Title I classrooms or other space required in conducting a Title I program may be paid by the Title I account to the General Fund. Space that has prorated use may **not** be charged to Title I. Excess costs of Operation and Maintenance of Plant may **not** be claimed for schoolwide programs. Funds must be budgeted on the initial Title I budget for this purpose and supported by the proper documentation on file locally. The Excess Costs Worksheet (see attached) presents calculation procedures for determining the **maximum** amount of Title I funds which may be budgeted for Excess Costs of Operation and Maintenance of Plant (Munis Code 0899). This worksheet and supporting documentation are maintained locally and will be reviewed during monitoring visits and/or audits. If excess costs of Operation and Maintenance of Plant are claimed, project funds for these costs may be paid to the local board of education only as follows:
- **Alternative A:** The total amount of excess costs of Operation and Maintenance of Plant approved for the project year may be paid to the board at the end of the school year. This expenditure will be made to the board and reported on the June 30 Expenditure Report.
 - **Alternative B:** One-half of the year's approved excess costs of Operation and Maintenance of Plant may be paid to the board at the end of the first semester with the balance paid at the end of the school year. The district will report one-half expenditures on the Expenditure Report for the period ending December 31 and the balance on the report for the period ending June 30.

Worksheet

Excess Costs of Operation and Maintenance of Plant

The following is an example of a worksheet showing excess costs for operation and maintenance of plant. If a district charges Title I for excess costs for operation and maintenance of plant, the worksheet and backup documentation must be on file in the district Title I office for review.

Note: **MUNIS** combines Operation and Maintenance of Plant under Function Code 2600.

Note: Operation and Maintenance costs may **not** be claimed for a schoolwide program.

1. Total district costs of Operation and Maintenance of Plant during the 2001-02 school year (MUNIS Function Code 2600): \$259,550
2. Number of classrooms and classroom equivalents used at each school during the 2001-02 school year:

School	Classroom	Cafeterias*	Gyms**	Offices	Library	Other	Total
Board Office	0	0	0	6	0	0	6
Washington	18	1	1	3	1	2	31
Jefferson	20	1	1	3	1	1	32
Lincoln	22	1	1	3	1	2	35
Kennedy	34	1	1	4	1	3	49
Regan	36	1	1	4	1	3	51
Clinton	48	1	1	6	1	5	67
Totals	178	6x2=12*	6x5=30**	29	6	16	271

*Each cafeteria figured as two classroom equivalents.

**Each gym figured as five classroom equivalents.

3. Average cost for each classroom, or its equivalent, based on Parts 1 and 2 above:
 $\$259,550 \div 271 \text{ classrooms} = \$957.75 \div 12 \text{ months} = \79.81
4. Number of Title I classrooms and/or offices for which operation of plant and maintenance expenses represent excess costs (see Part 6 criteria of this project):
 1 public secondary classroom; 5 public elementary classrooms; .5 private Title I reading room**
 $6 \text{ public} + 0 \text{ private} = 6 \text{ total}$
 **No fraction of a classroom is to be counted due to Item A. in Part 6 below.
5. Calculated Excess Costs for Operation of Plant for the 2001-02 school year:
 $6 \text{ classroom} \times \$79.81 \text{ per classroom per month} \times 9.25 \text{ months} = \$4,429$
6. The following statements must be included as Part 6 of the worksheet: The number of classrooms/offices entered in Part 4 above includes only those spaces used throughout the project period and to which the following conditions apply:
 - A. The same space would not incur operation and maintenance costs in the absence of Title I programs;
 - B. The use of Title I classrooms/offices actually increases the district's operation and maintenance of plant costs; and
 - C. The actual operation and maintenance of the Title I space is not substantially less than the other spaces of the same size included in the display in Part 2 above.

OTHER INFORMATION

TITLE I INVENTORY REGISTER

NCLB Title I, Part A (EDGAR 80.32)

1. All nonconsumable items having a useful life of one year are required to be listed on the Title I inventory register. If an LEA charges repair costs or insurance costs to the Title I grant, the items must be identified on the Title I inventory register as purchased with Title I funds.
2. The Title I inventory register should be updated annually with new purchases identifying the date of purchase, serial numbers, location, etc. This information will be needed if items are stolen, if items no longer usable need to be disposed of, and to justify repair/insurance expenditures. A physical inventory must be conducted once every two years.
3. Items may be insured but insurance is not required. The insurance premium for Title I items may be paid with Title I funds if funds were budgeted for this expense.
4. Items stolen may be removed from the inventory list after a police report has been filed.
5. Items can be repaired or maintained with Title I funds if the items were purchased with Title I funds and money was budgeted for equipment/materials repair.
6. All nonconsumable items should be labeled as "Title I" either by engraving, dry marker, or gummed labels. It is recommended the project year also be identified on the label.
7. The inventory register should be a cumulative inventory from the beginning of the program rather than a separate inventory for each year. Items are to be listed on the inventory as long as they are usable.

If no longer useful and cannot be used in another federal program, EDGAR specifies disposal procedures to be followed. Any items with a current per unit fair market value of less than \$5,000 can be retained, sold or otherwise disposed of with no further obligation to the federal government. If the current per unit fair market value is over \$5,000, a letter requesting permission to dispose of the item(s) should be sent to the program consultant for further instructions. Specific identified appraisal/bid procedures must be followed with the federal government retaining the right to a share of the proceeds of the sale. For equipment purchased with Title I Capital Expense funds, see the attached information.

Disposition of Title I, Part A Purchased Equipment

(With a Fair Market Value Under \$5,000)

1. For items purchased with Title I, Part A funds that now has a fair market value under \$5,000 per unit, it is **no** longer necessary to send a letter to the state Title consultant requesting to dispose of the equipment.
2. Offer the equipment first to other Title I programs, then to Special Education and other federal programs and finally to the regular program.
3. If the equipment is not usable, throw it away.
4. If it is given to other programs or is thrown away, remove the equipment from the inventory and document what was done with it. Keep the documentation in the district Title I office.

Disposal of Equipment Purchased with Capital Expense Funds

Vans, mobile classrooms and re-locatables are all considered equipment and not real property. Equipment of this nature that has been purchased with Title I Capital Expense funds may continue to be used to serve eligible private school students. The cost of maintaining and operating this equipment is to be paid out of Capital Expense funds. If Capital Expense funds are no longer available, these expenses must be paid off the top out of the LEAs administrative funds.

If it is determined, after meaningful consultation with the private schools, that the equipment is no longer needed to serve eligible private school students, the procedure for removing the equipment from the inventory depends upon the per unit fair market value of the equipment. Fair market value is to be determined in writing by anyone qualified and knowledgeable in the area.

If the per unit fair market value of the equipment is less than \$5,000, the LEA may either retain, sell or otherwise dispose of the equipment without any further obligation to the Title I program or the federal government. It can be used to serve public school students in either another federal, state or local program.

If the per unit fair market value of the equipment is more than \$5,000, the LEA must open the sale of the equipment for sealed public bid. The LEA must indicate in the announcement of the sale as to whether or not they will be participating in the bidding. The sale of the equipment would go to the highest bidder. After the sale, the LEA would write a letter to the SEA describing the sale and the removal of the equipment from the inventory. Since the equipment was purchased with Capital Expense funds, the proceeds would be put into a separate account and could only be used for other Capital Expense activities in the LEA or SEA. If these funds cannot be used by either the LEA or SEA, they must be returned to the federal government.

[illegible]

TIME AND EFFORT RECORD/LOG

OMB Circular A-87

1. If district personnel are partially funded with Title I funds, a record/log is required. The record should specify the amount of time working directly with the Title I program. A sample record/log is attached.
2. The time and effort record should be signed by the person's supervisor or by the superintendent.
3. If school personnel in a Targeted Assistance School are partially funded with Title I funds, a schedule (or a log) is required. The schedule should specify the amount of time working directly with the Title I program and should include "non-instructional" duties.
4. There should also be some type of certification or documentation for the payroll clerk verifying which programs personnel are paid from. This is for personnel paid completely out of Title I and for personnel paid partially out of Title I. This applies to personnel at the district and school level.

TIME AND EFFORT RECORD									
Employee Name:					Month:				
Reporting Period	GRANT	GRANT	GRANT	GRANT	Reporting Period	GRANT	GRANT	GRANT	GRANT
Day of Month					Day of Month				
1					16				
2					17				
3					18				
4					19				
5					20				
6					21				
7					22				
8					23				
9					24				
10					25				
11					26				
12					27				
13					28				
14					29				
15					30				
					31				
TOTALS 1-15					TOTALS 16-31				
This is to certify that the undersigned has completed work during the time period for the federal programs as indicated above.									
Employee Signature:					Supervisor Signature:				

STEVENS AMENDMENT

SPECIAL CONDITIONS FOR DISCLOSING FEDERAL FUNDING IN PUBLIC ANNOUNCEMENTS

The recipient agrees that, when issuing statements, press releases, requests for proposals, bid solicitations, announcements of contract awards under the grant, and other documents or announcements describing this project, the recipient shall state clearly:

1. The dollar amount of Federal funds for the project;
2. The percentage of the total cost of the project that will be financed with Federal funds;
3. The percentage and dollar amount of the total cost of the project that will be financed by non-governmental sources.

In addition, when announcing any contract award for goods or services with an aggregate value of \$500,00 or more, the recipient agrees to specify the amount of Federal funds used to finance the contract and the percentage of total costs of such a contract that the Federal funds represent.

Title I, Part A, C.F.D.A.#84.010

Note: According to EDGAR (Education Department General Administrative Regulations) The word “project” as used in the Stevens Amendment means the activity described in the application, or any subject subpart thereof. The Stevens Amendment information is identifying that the activities described in the report, brochure, workshop notice, etc., are funded with Title I federal funds, not that the cost of the newspaper advertisement or printing cost of the brochure are being paid for with Title I funds.

For example: Have you ever attended a play or musical production where the program identifies that the performance is being sponsored by a grant from the National Endowment for the Arts and a local business? Remember those road improvement signs at road construction sites that identify that the road improvement is being paid for with your taxes? The brochure/sign isn't saying the cost of printing the brochure/sign is paid for with the grant/taxes although it may have been; it is saying the 'performance' or 'road improvement' is being paid for with the grant/taxes.

Sample

Federal funds from the Title I, Part A, C.F.D.A. #84.010 are financing 100% of the costs of this workshop from an approximate project amount of \$117,000.

